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defined in urban area plans or community plans.

- LU 10. **Agricultural Land, Service Facilities Limited**
Agricultural lands will be additionally protected from urban encroachment by limiting the extension of service facilities, particularly sewers.
- LU 11. **Agricultural Use Inside Urban Boundaries**
Where lands are designated for agricultural use in the Community or Area Plans, but no specific policy is included in that Plan, the policies of this countywide General Plan, as amended, apply.
- LU 12. **Agricultural Lands in Urban Areas**
Lands designated agricultural inside of urban area boundaries, but outside of city limits, shall be subject to the same conservation standards, limitations, and other requirements to conserve the agricultural land use, as are lands outside the Urban Area Boundaries except such lands between the City limit line may be designated for efficient phased development to eventual nonagricultural uses according to the terms and requirements of the adopted Urban Area Plan, as amended.
- LU 13. **"Timed" Zoning**
Yolo County shall apply A-1, agricultural zoning to lands scheduled for agricultural use in the Urban Area Plans, or the Community Area Plans, and for later or "timed" conversion to urban uses, including "Second Stage Urban Residential" designations. Definite sequencing schedules should be included in the zoning action and indicated on the official zoning map. No area outside of a designated urban area shall be so designated.
- LU 14. **Subdivision Prohibited**
New residential or suburban subdivisions are prohibited in the agricultural designated areas.
- LU 15. **Commercial and Industrial Use Prohibited**
All commercial and industrial uses are prohibited in the agricultural area except those directly related to and incidental to the agricultural operation conducted on the land, as allowed in the following policy.
- LU 16. **Agricultural Uses**
Land uses permitted in the agricultural area shall be limited to those directly related to the production of agricultural crops on the land, except as described in the following three policies plus policy on page LU 12.

LU 17. Residential Uses/Agricultural Lands

Residential land uses in the agricultural areas shall be limited to dwellings only for preservation of the family farm, for farm employees and those persons who own the farm land, up to a limit established by ordinance and implemented by Conditional Use Permit. All such dwellings shall be encouraged to locate on lands unsuited for agricultural use and/or in "clustered" configurations to minimize the conversion of agricultural lands to any other uses. A maximum dwelling unit density for the total acreage in the farm or ranch shall be established by ordinance.

LU 18. Agricultural Area Uses

Yolo County shall consider the placement of certain agricultural related land uses in agricultural areas, by means of conditional use permits, which may be incompatible with urban sites by reason of hazard or nuisance to concentrations of people. Findings for approval shall include, but are not limited to:

- The use is directly related to agricultural land use (cultivation of agricultural plants, or the raising of animals), and
- Will not diminish nor prevent agricultural use on site or on adjoining agricultural lands, and
- The use has some hazard or nuisance aspect which precludes it from being placed in an urban area, and
- The use can be developed in the area without significant reduction of cultivation, growth, and harvesting of the indigenous agricultural products.

LU 20. Prohibit Residential Use/Division

Yolo County may prohibit the development of residential land uses on parcels of property created by land divisions in agriculturally designated areas. Such requirement shall be assured by appropriate means.

LU 21. Agricultural Land Division

The division of land in a agricultural area for the purpose of providing homesites for persons not engaged in agricultural activities are prohibited by these policies.

LU 22. Tax Laws for Agricultural Land Preservation

Yolo County will support taxation laws which have the effect of supporting the continuation of agricultural land use.

- LU 34. **Locate Commercial Uses/Urban or Park Areas**
Commercial land use activities and facilities, necessary to support recreation or agriculture, should be confined wherever possible to existing urban areas, at marinas, or as concessions in public parks.
- LU 42. **Government Offices/Location**
Relocation of existing and location of new Federal, State, and County government offices shall be in central business districts where designated or otherwise in urban designated areas after study to determine appropriate locations in terms of minimizing conflicts, assuring appropriate public access, and avoiding the sprawl or diffusion of urban uses into rural, agricultural areas or of diffusion of office uses into residential or industrial uses.
- LU 63. **Urban Use Removal in Agricultural Areas**
Yolo County shall regulate and encourage removal of urban land uses and facilities including off-site advertising and other non-agricultural uses, from agriculturally designated lands.

Circulation

- CIR 12. **Pedestrians**
Yolo County shall promote and ensure the provision of facilities and routes where appropriate for safe and convenient use by pedestrians including sidewalks, pedestrian access to all public facilities and transit stops, and to public areas in the community including waterfront projects and recreation hiking trails.
- CIR 13. **Bicycle Routes and Facilities**
Yolo County shall promote and ensure opportunities for bicycle use. The following means shall be used to achieve this policy:
- Design streets to accommodate bikeways
 - Sign and mark bike routes
 - Provide sloping curbs at all street corners
 - Provide or receive serviceable bike parking facilities in the Central business areas, at public buildings, on school grounds, and at new businesses, industries, and multi-family developments which require development permits, zoning, site plan reviews, or extensions of permits.

- Require secure bike parking areas in all parking lots subject to use by the public whenever new or renewed permits are required.
- Require construction of bike routes on all new thoroughfares and arterial highways developed in or for any development project.
- Provide funding for building and maintenance of bike routes and facilities through application of federal or state aid bicycle registration, licensing, and directed fines for bicycle operation violations.
- Provision and encouragement of use of bicycle use incentives.
- Encouragement and establishment of bike routes along trails, on levees, along railroad levees, along drainage canals, and along transmission rights-of-way where feasible.
- Designate part of the Yolo Plank Road and Turnpike as a part of the countywide bikeway system.
- Implement the Yolo County Bikeway Plan (adopted 26 October 1982 by the Yolo County Board of Supervisors) including the standards and routes therein.

CIR 25. District Coordination

Yolo County shall develop agreements with Reclamation Districts for hiking, biking, and horse trails on levees and other rights-of-way and will provide for policing to ensure safe use by the public as well as security for adjoining land owners and users.

Safety

S 8. Yolo By-Pass/Other Designated Floodways

Yolo County shall not approve residential development, including farm dwellings, or other structures housing large numbers of overnight residents, in the Yolo By-Pass or other designated floodways.

Open Space

OS 1. Open Space, Basic

Yolo County shall preserve appropriate open space land through available means of land use controls, regulations, and advice or guidance and through coordination with the other elements of this General Plan, as amended, and with other agencies.

OS 2. County Will Preserve Open Space

Yolo County shall use the Land Use Element policies, together with Specific Plans, zoning, use permits, site plan review, building permits, subdivision maps, the Agricultural Preserve-Land Conservation Act of 1965, assessment practices, coordination with the Soil Conservation Service, and other available means to preserve all lands defined as Open Space*.

* Open Space land is any parcel or area of land or water which is essentially unimproved and devoted to an open space use as listed below:

- Banks of lakes, streams, rivers or lakeshores
- Flood control by-pass or channel
- Fish, wildlife, and plant habitat
- Areas prescribed for ecologic or other scientific study purposes including archaeological sites.
- Areas used for managed resource production including:
 - Agricultural land
 - Rangeland
 - Managed food and fiber production areas
 - Groundwater recharge areas
 - Marshes, rivers, lakes, and streams important for fisheries
 - Areas containing major mineral deposits, including sand and gravel, clays, ores, metals, and oil or gas
- Areas used or needed for outdoor recreation including:
 - Areas of outstanding scenic, historic, or cultural value
 - Areas particularly suited for park and recreation purposes
 - Areas for access to lakeshores, rivers, and streams
 - Areas linking major recreation and open space reservations including:
 - Utility easements
 - Banks of rivers and streams
 - Trails

- Areas of Scenic Highway corridors.
- Areas needed for Public Health and Safety, including:
 - Areas needing special management, mitigation, or avoidance because of hazardous or special conditions such as:
 - Earthquake fault zones
 - Unstable soil areas
 - Flood plains
 - Watersheds
 - Areas of high wild fire risks
 - Areas for water reservoirs
 - Areas required for protection and enhancement of air quality

- OS 3. Agricultural Land
Yolo County shall preserve agricultural land as the principal component of open space.
- OS 4. Urban Uses in Urban Designated Areas
Yolo County shall restrict urban uses to urban areas defined and mapped in the General Plan, as amended, of Yolo County and the several Urban Area Plans and Community Area Plans, as amended.
- OS 5. Limiting Facility Extensions
Yolo County shall protect open space lands from urban uses by limiting the extension of existing service facilities, particularly sewers. Where the County does not directly control the provision of such facilities, it shall respond in the negative to proposals to extend services by respective cities or districts and shall respond in the negative to related environmental impact reports produced by the lead agency on such proposals.
- OS 6. Open Space Corridors
Yolo County shall establish and maintain open space corridors through existing and future urban development. Drainage ways, streams, and river front together with open space adjoining schools and other public lands may be integrated into an open space corridor plan and conformance with such plans shall be mandatory for all new development or redevelopment.

- OS 7. Schools Linked to Open Space
Schools should be located in or near open space areas and linked to residential areas by means of open space corridors wherever possible.
- OS 8. Trails
Recreation, bikeways, trails, and other public areas shall be integrated with open space plans and the provision of open space areas and corridors; and conformance with such plans shall be mandatory for all new development or redevelopment.
- OS 9. Scenic Areas
Yolo County shall plan to maintain scenic highways and waterways or riverbank corridors areas of scenic value as part of its open space preservation program and shall use persuasion and regulation to that end.
- OS 10. Landscape Ordinance
Yolo County shall adopt a landscape ordinance and one purpose of such ordinance will be to preserve and enhance open spaces.
- OS 11. Wildlife Habitat
Yolo County shall plan to safeguard existing and encourage additional areas of wildlife habitat as part of its open space preservation program.
- OS 12. Coordination
Yolo County shall coordinate and cooperate with other local agencies and State and Federal agencies to conserve or preserve open space in areas defined or mapped as open space in these policies.

Conservation

- CON 5. Element Content
In order to avoid conflict with this General Plan, as amended, or to avoid environmental hazards, Yolo County shall require conservation of natural resources, in the development and managed utilization including:
- Water and its hydraulic force
 - Forests
 - Tree borders along roads and highways
 - Soils
 - Rivers and other surface waters
 - Harbors (marinas)
 - Fisheries
 - Wildlife

- Minerals
- Other natural resources including gas, oil, and geothermal
- The reclamation of lands and waters
- Flood control
- Prevention and control of the pollution of streams and other waters
- Regulations of the use of land in stream channels and other areas required for the accomplishment of the conservation plan.
- Prevention, control, and correction of the erosion of soils, beaches, and shores.
- Protection of watersheds
- The location, quantity, and quality of rock, sand, and gravel resources.

CON 6. Long Term Value

Yolo County shall plan, encourage, and regulate to ensure that natural resources are maintained for their long-term ecological values as well as for their more direct and immediate benefits.

CON 8. Urban Growth/Natural Environment

Urban growth shall be permitted only in accord with and respectful of the natural environment. Particularly this policy shall apply to riverfront lands and adjoining agricultural lands.

CON 9. State Resources

Yolo County shall ensure the protection, maintenance, and wise use of the State's natural resources, especially scarce resources and those that require special control and management.

CON 10. Protection of Resources

Yolo County shall plan, encourage, and regulate public and private agencies to prevent the wasteful exploitation, destruction, or neglect of the State's resources.

CON 11. Soils/Agricultural Use

Yolo County shall encourage the highest agricultural use of good agricultural soils and the development of acceptable agricultural industry. Only agricultural development shall be allowed outside of Urban Area Boundaries and Community Area Plan lines except as a legal replacement of an existing, legal use or as specifically provided elsewhere in this General Plan.

CON 12. Soils

Yolo County shall regulate land use and encourage and cooperate with appropriate agencies to conserve, study, and improve soils. Prime soils

shall be preserved outside of designated urban areas.

CON 13. Land Forms

Yolo County shall regulate development to avoid degradation or land forms through nonagricultural grading, construction, or routing of lines or towers, or placement of antennae, wind generators, solar generators, and similar devices.

CON 14. Grading Ordinance

Yolo County shall consider the feasibility of a grading ordinance to apply to all lands designated "watershed" and to unincorporated areas within the boundaries or Urban Area and Community Area Plans on the adopted General Plan map, and shall continue to study the need to adopt a grading ordinance or standards for other areas. Agricultural operations shall not be included in this grading ordinance.

CON 17. Water Reclamation

Yolo County shall encourage waste water reclamation and reuse.

CON 19. Watersheds

Yolo County shall designate and map, by overlay, watershed areas with uses limited to grazing and wild hay production, with soil, water and wildlife conservation practices.

Watershed designated areas shall be limited to grazing; wild hay production; soil, water, and wildlife conservation activities, with non-intensive recreation as a secondary use.

CON 20. Groundwater

Groundwater shall be protected from overdraft and shall not be encroached upon by construction. Impervious surfaces should be reduced or replaced and groundwater recharge enhanced. The use of non-impervious surfaces is encouraged.

CON 22. Cottonwood, Willow Slough, Colusa Drain

Yolo County shall cooperate in the completion of drainage projects for the Cottonwood and Willow Slough areas, and for the Colusa Drain.

CON 23. Sacramento River and Putah Creek

Yolo County shall encourage additional use of Sacramento River and Putah Creek water.

CON 35. Cache Creek

Yolo County shall adopt a Cache Creek Management Program for the carefully managed use and conservation of Cache Creek and its sand and gravel resource, its riverside environment, and its relationship to ground and surface water characteristics, and its value as a fishery and recreation resource.

CON 36. Putah Creek Mining

Yolo County shall discourage mining in Putah Creek.

CON 38. Provision of Water

Yolo County shall coordinate with providing agencies to assure that sufficient clean water is available for existing, approved, and presently planned uses. First priority for water resources shall go to existing legal land uses.

CON 41. Review By Resource Conservation Person

Yolo County may require a review and report from a qualified Resource Conservation person on all permit approvals for land use or land division in designated agricultural areas.

Scenic Highways

SH 5. Protection

Yolo County shall regulate and guide land uses, recreation, circulation, conservation, and open spaces and shall require retention or conservation of natural features and vegetation along both State and locally designated scenic highways.

SH 6. River Roads

Yolo County shall consider designating "river roads" as designated scenic highways.

SH 7. Natural Vegetation and Landscaping

Yolo County shall require retention of existing trees and vegetation and natural landforms, and shall require landscaping to enhance scenic qualities and/or screen unsightly views, and shall implement regulations to prohibit removal of trees along public rights-of-way without consideration of their scenic or historic value, and shall implement tree conservation or enhancement in new development, with emphasis on oak preservation.

Recreation

REC 1. Recreation Basic

Yolo County acquires, maintains and provides a variety of park, open and natural areas for recreational and leisure pursuits at the regional, community and neighborhood level through means of California statute, established land use controls, regulations, real property transfer, and the advise, guidance and cooperation of other jurisdictions and through coordination with other elements of this General Plan, as amended.

It shall be the basic recreation policy of the County to:

1. Protect and preserve as many of the County's recreational and scenic resources as possible;
2. Maintain diversified regional-type recreation facilities and programs;
3. Assist in preserving the open space resources of the County;
4. Cooperate with special districts, cities, adjacent counties, and state and federal agencies in the acquisition, development and administration of recreational facilities, resources and programs for joint use and mutual advantage;
5. Cooperate with and encourage private individuals and organizations in the preservation, acquisition and administration of recreation resources;
6. Assist local rural communities in obtaining a basic level of recreation service;
7. Encourage and assist in the development of bicycle and hiking trails in and to County parks and recreation areas;
8. Encourage greater understanding of the park system and the resources it protects by development of an interpretive program.

The following statements of objectives shall guide the County in adhering to the recreation policies of this element:

1. It will be the County's responsibility to provide for the direct development, operation and maintenance of regional park and recreation areas only.

2. Community and neighborhood park development and operation is a responsibility of the local governing body or, at most, an indirect County responsibility. Such services shall not be a primary function of the County park system.
3. Fees and charges should supplement tax appropriations, grants or gifts when applicable, as a source of revenue and should not be the primary source of funds for operation.
4. The extension of recreation services should be based upon service value and not the income producing potential of such a service.
5. There will be an attempt to insure that those people who use publicly supported recreational facilities contribute toward the cost of providing and operation those facilities.
6. The mandatory dedication of land or a payment of fees for parks and recreation purposes shall be required as a condition of subdivision and parcel map approval upon adoption of a suitable "set-aside" ordinance.

REC 2. Specific Recreation Projects

Yolo County shall establish and annually update a list of specific recreation and leisure service projects and programs, including site acquisition, area easement, project development and improved operation.

REC 3. Mandatory or "Set-aside" Acquisition Planning

Yolo County shall establish countywide plans for acquiring park and recreation properties under mandatory or "Set-aside" dedications.

REC 5. Water Recreation

The County shall adopt use plans regulating the public recreational use of streams, lakes and reservoirs.

REC 6. Riverfront

Development of riverfront recreation areas shall offer recreational facilities, visual aesthetics and open space amenities, while insuring access to the river for all residents.

REC 9. Park Plans

Yolo County shall establish and regularly update comprehensive park plans and resource inventories for each unit of the County park system.

REC 11. Mitigation of Effects

Yolo County shall require mitigation measures at and adjoining public and private recreation facilities and places to balance the public recreation needs versus the local property owners needs and shall include:

1. Trash and litter control and removal
2. Trespass enforcement
3. Other law enforcement
4. Vandalism and shooting prevention measures
5. Sign controls
6. Parking regulation
7. Other measures to eliminate or reduce safety or nuisance hazards to adjoining and nearby properties and persons.

REC 14. Coordination and Cooperation with other Governments

In providing for parks, recreation and general leisure services, the County shall provide the specific procedural means whereby cooperation and coordination between levels of government is regularly accomplished.

REC 15. Public Participation

Yolo County provides concerned individuals, organizations, and public agencies with the Yolo County Parks and Recreation Advisory Committee as a forum for the expression and discussion of parks and recreation element matters.

COUNTY OF SOLANO

General Plan

Land Use and Circulation Element

DEVELOPMENT STRATEGY

Goal

Provide for orderly growth which assures a harmonious relationship of land uses, both rural and urban, and maintains the distinctive character of each community in Solano County.

Policies

1. Urban development shall be confined to land use patterns which retain essential agricultural lands of the County and minimize energy consumption.
2. Rural and suburban development shall be confined to non-essential marginal agricultural lands with a low capability of agricultural production and in a manner which minimizes conflicts with surrounding agricultural activities.
3. The unincorporated area shall not be developed with urban uses and urban services shall not be provided, except minimal public facilities and services essential for health, safety and welfare.
4. The County, in cooperation with the cities, shall maintain urban growth lines around local city jurisdictions which clearly define the extent of urbanization proposed within the general plan.
5. It shall be the County's policy to encourage phased development within urban growth lines so that first priority is given to development of vacant land currently served by public facilities and services and second priority given to development of land adjacent to existing urban areas.
6. The County shall make special efforts to encourage and assist cities in maintaining their community identities within defined community buffers in appropriate productive open space use.
7. The County shall participate with cities and special districts in establishing agreements which delineate community buffers.

AGRICULTURAL AND OPEN SPACE LAND USE

Goal

Maintain and enhance environmental quality of Solano County as it relates to the use of land, water and air by managing and preserving the diverse natural resources of the County for the use and enrichment of the lives of present and future generations.

Policies

1. Preserve and maintain essential agricultural lands including intensive agricultural areas comprised of high quality soils and irrigated lands and

extensive agricultural areas with unique or significant dryland farming or grazing activities.

2. In essential agricultural areas, the County shall encourage the formation and retention of agricultural parcels of sufficient size to be maintained as a farmable unit. Farmable units are defined as the size of parcels a farmer would consider leasing or purchasing for different agricultural purposes as follows:

160-acre minimum parcel size for non-irrigated lands.

80-acre minimum parcel size for irrigated lands.

40-acre minimum parcel size where "highly productive" irrigated parcels are demonstrated to exist.

3. Urban development shall be confined to patterns which do not conflict with essential agricultural lands.
4. Rural and suburban development shall be confined to non-essential marginal agricultural lands with a low capability of agricultural production and in a manner which minimizes conflicts with surrounding agricultural activities.
5. Non-essential agricultural lands should be protected and retained in agricultural use until land conversion to non-agricultural uses becomes necessary.
6. Encourage consolidation of the fragmented pattern of agricultural preserves established under the Land Conservation Act and the retention of agricultural preserves in essential agricultural, watershed, and marshland areas.
7. The County shall support changes in local, State, and Federal taxing structures which promote the retention of agricultural parcels in agricultural use.
8. Agricultural practices shall be conducted in a manner which minimizes impacts to air and water quality and marsh and wildlife habitat.

WATERSHED LANDS

Policy

The County shall preserve and maintain its watershed areas which are characterized by slope instability, undevelopable steep slopes, high soil erodibility, extreme fire hazards and the lack of water and public services in extensive agricultural use.

MARSH AND WETLAND HABITAT

1. The County shall protect its marsh waterways, managed and natural wetlands, tidal marshes, seasonal marshes and lowland grasslands which are critical habitats for marsh-related wildlife.
2. In marsh areas, the County shall encourage the formation and retention of parcels of sufficient size to preserve valuable tidal marshes, seasonal marshes, managed wetlands and contiguous grassland areas for the protection of aquatic and wildlife habitat.
3. The County shall ensure that development in the County occurs in a manner which minimizes impacts of earth disturbance, erosion and water pollution.
4. The County shall preserve the riparian vegetation along significant County waterways in order to maintain water quality and wildlife habitat values.

VISUAL CORRIDORS

Policies

1. The County shall make special efforts to encourage and assist cities in maintaining their community identities by retaining existing visual corridors and establishing community buffers.
2. The County shall protect and maintain visual corridors and community buffers in appropriate open space uses.

WATER QUALITY

Policies

1. The County shall preserve the riparian vegetation along significant County waterways in order to maintain water quality.

RECREATION LAND USE

Policies

1. The County's principal role for recreation development shall be to provide for regional facilities designed to serve all the citizens of Solano County.
2. The County shall preserve and protect possible future park sites and recreational areas from uses which are not compatible with their future development and use.
3. The County will engage in recreation development by planning, promotion and policy making, and will participate in the most appropriate fashion in the construction and operation of outdoor recreation facilities by State, regional, municipal, county, private, and district recreation agencies. The agency designated to operate a given recreation facility will be chosen by considering:
 - (a) The origin of its users.
 - (b) The importance and significance of the offered opportunities.
 - (c) The financial capacity of the agency.
 - (d) The extent to which private enterprise can play a part.
4. The County shall give priority to recreational activities which are family oriented within an hour's drive of home, offering day use facilities and active and passive recreation for all age groups and having biking, boating, and riding access to the County's outstanding scenic features.
5. The County will plan and, if feasible, jointly undertake with neighboring counties and other jurisdictions programs to secure inter-regional parks, other recreational opportunities, and Federal assistance for their development.
6. Recreational activities that could result in adverse impacts on agriculture and the environment of marsh and wetland habitat areas should not be permitted.

NATURAL RESOURCE RECREATION AREAS

General Policies

1. The County should encourage the multiple use of land for recreational purposes consistent with policies to eliminate potential conflicts between the recreational uses and the primary planned use of the land.
2. The County shall preserve and enhance watersheds, canyons, creeks, lakes, and other scenic open space areas in appropriate open space uses.

Policy

The County shall ensure continued recreational opportunities along Putah Creek through the protection of the creek from adverse impacts and the provision of access and facilities on public lands, where appropriate, jointly with Yolo County. Recreational use of Putah Creek shall be conducted in a manner which is compatible with surrounding land uses, and protects its continued use as a public water supply.

RURAL RESIDENTIAL AREAS

Policies

1. In the County's large lot rural residential areas, recreational easements should be planned for development of horseback riding, hiking and bicycling trails.
2. Horseback riding, hiking and bicycling circulation systems should be designed to link scenic recreational areas with urban areas in a manner which does not conflict with contiguous uses.

RESIDENTIAL LAND USE

General Policies

1. The unincorporated County's principal housing role shall be to accommodate future residential development which constitutes an accessory use to agriculture (farm residence and farm labor quarters) and a moderate amount of rural residential development.
2. Housing units in the unincorporated area shall consist primarily of single-family homes for farm related and rural residential development.

RURAL RESIDENTIAL

Policies

1. Clustering of development meeting overall density standards should be applied in the unincorporated areas when necessary to preserve open space and environmental quality and provide for the efficient delivery of services and utilities, as well as to mitigate potential health and safety hazards.
2. The County shall provide for rural residential development in an orderly manner within the time frame of the plan and within the reasonable ability to provide health and safety services.
3. The County shall phase future residential development giving first priority for development to those areas presently zoned for rural residential use and where rural residential development has already been established and second priority to undeveloped areas designed for future residential use.
4. The County shall seek to preserve the rural character, flavor, and identify of its residential communities.

INDUSTRIAL LAND USE PROPOSALS

General Policies

1. Preserve and maintain the County's agricultural base recognizing that it is an industry which contributes significantly to the economy of the County.
2. Future industrial development shall be located and developed in a manner which protects the County's essential agricultural lands and does not conflict with adjacent and surrounding agricultural activities.

AGRICULTURAL RELATED INDUSTRIES

Policies

1. The County shall provide for a limited amount of agriculturally related industrial services which demonstrate the need for rural locations.
2. Agriculturally related industry should be located on sites which have limited capabilities for agricultural production.

DRAINAGE FACILITIES

1. Natural watercourses should be protected and preserved in their natural state, with runoff from urban developments accommodated by facilities designed to control the rate and dispersal of runoff.

CIRCULATION

Policy

Develop a trail and bikeway system along selected routes to provide inter-city and inter-county access.

Objective 1 - Coordinate the planning and development of recreational opportunities and facilities between federal, state, regional and local agencies within Solano County.

Policies

1. The County shall work with and assist local agencies and districts in identifying and protecting significant recreational resources.
2. The County shall work with local agencies and districts in identifying recreation needs and coordinating and supporting plans and programs to address those needs.
3. The County shall encourage and support other public agencies and private groups in the development of recreation facilities which are consistent with Recreation Element objectives.
4. The County shall advocate and support City recreation proposals which advance County recreation goals and objectives to other agencies which may provide funding and assistance.
5. The County shall actively pursue joint or reciprocal agreements with other governmental jurisdictions or private groups for acquisition, development or maintenance of recreational facilities where recreational benefits can be obtained.

Objective 2 - Identify, preserve, and protect significant open space and recreational resources.

Policies

1. The County shall protect identified recreational sites and resource areas in open space and agricultural uses.
2. Site future recreational facilities to avoid or minimize conflicts with adjacent land uses wherever possible.
3. The County shall identify open space areas which serve as visual separators between communities and protect and maintain their scenic value and recreational resources.

Objective 3 - Encourage land use patterns surrounding existing and potential recreation sites and facilities which are compatible with their development and continued use.

Policies

1. Areas surrounding recreational sites should be maintained in open space or other compatible uses to protect the natural setting and environment of the site.
2. Land use development proposals adjacent to recreation sites shall be reviewed for compatibility with natural and recreational features and uses of the site.

Objective 4 - Encourage appropriate multiple use of land for recreation and other uses.

Policies

1. The County shall make the optimum use of public lands by developing or promoting development of compatible recreational uses when feasible.
2. In recreational resources areas, the County shall support passive and active recreational activities compatible with the primary use of the land.

Objective 5 - Plan and develop regional recreational facilities which offer opportunities for a wide variety of recreational activities.

Policies

1. The County shall give development priority to recreation sites which can accommodate multiple activities that best address the identified

recreational needs and take advantage of significant natural features which enhance the recreational experience.

2. Recreational sites shall be designed and developed in a manner which enhances natural and recreational features and minimizes environmental impacts to the site and adjacent land uses.
3. The County shall consider the special needs of the elderly and the physically impaired in the design and development of recreational facilities.
4. The County shall ensure adequate parking and access to recreational facilities to accommodate projected use.
5. The County shall encourage the development of transit services between recreational facilities and population centers.
6. The County shall seek new sources of funds and explore innovative institutional and funding arrangements for developing and maintaining county recreational facilities.

Objective 6 - Provide for the special recreational needs of the County.

Policies

1. The County shall provide sites and opportunities at appropriate locations for the development of special and unique recreational activities which cannot be accommodated within urban areas.
2. The County shall encourage development of linkages (such as riding, hiking and biking trails) between population centers and recreational facilities.
3. Recreational needs of rural residents shall be considered in the design and development of future rural residential subdivisions.

Objectives 7 - Support the development of community and neighborhood recreation facilities and programs, including both indoor and outdoor activities, within the County's urban areas.

Policy

1. Parks and recreation resources at the neighborhood and community levels shall be developed through City agencies and local park districts.

Objective 8 - Encourage the development of carefully sited less intensive private recreational uses within the unincorporated area which complement and support the County's recreation programs.

Policies

1. The County shall encourage and promote less intensive private recreational facilities which expand recreation opportunities including camping, boating, off-road vehicle, shooting, historical activities, and related commercial recreational uses.
2. Private recreation facilities shall be designed and located in a manner which is aesthetically pleasing and minimizes adverse impacts on surrounding residential, agricultural, and open space uses.
3. Intensive private commercial recreational developments shall be confined to the County urban areas where necessary supporting facilities and services can be provided.
4. The County shall provide for private recreation concessions within County parks which support park activities.

APPENDIX C
PRIME FARMLAND SOIL TYPES

The following definitions are summarized from the "Advisory Guidelines for the Farmland Mapping and Monitoring Program.

- | | |
|------|---|
| P | PRIME FARMLAND
Land with the best combination of physical and chemical features for the production of agricultural crops. |
|
 | |
| S | FARMLAND OF STATEWIDE IMPORTANCE
Land with a good combination of physical and chemical features for the production of agricultural crops. |
|
 | |
| U | UNIQUE FARMLAND
Land of lesser quality soils used for the production of the State's leading agricultural cash crops. |
|
 | |
| L | FARMLAND OF LOCAL IMPORTANCE
Dry land crops and nonirrigated Prime and Statewide soil mapping units. |
|
 | |
| G | GRAZING LAND
Land on which the existing vegetation is suited to the grazing of livestock. |
|
 | |
| D | URBAN AND BUILT-UP LAND
Land occupied by structures or infrastructure to accommodate a building density of at least one unit to one and one-half acres, or approximately six structures to ten acres. |
|
 | |
| X | OTHER LAND
Land which does not meet the criteria of any other category. |
|
 | |
| LP | LOCAL POTENTIAL FARMLAND
Prime or Statewide soils which are presently not irrigated or cultivated. |

California Department of Conservation
FARMLAND MAPPING AND MONITORING PROGRAM

SOIL CANDIDATE LISTING
for
PRIME FARMLAND AND FARMLAND OF STATEWIDE IMPORTANCE

YOLO COUNTY

U.S. Department of Agriculture, Soil Conservation
Service, soil surveys for Yolo County include:

Soil Survey of Yolo County, California,
June 1972

3/27/90

YOLO COUNTY
PRIME FARMLAND SOILS

U.S. DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
DAVIS, CALIFORNIA 95616

THESE SOIL MAPPING UNITS MEET THE CRITERIA FOR PRIME FARMLAND AS
OUTLINED IN THE U.S. DEPARTMENT OF AGRICULTURE'S LAND INVENTORY AND
MONITORING (LIM) PROJECT FOR THE YOLO COUNTY SOIL SURVEY.

<u>Symbol</u>	<u>Name</u>
AaA	Arbuckle gravelly loam, 0 to 2 percent slopes
AaB	Arbuckle gravelly loam, 2 to 5 percent slopes
BrA	Brentwood silty clay loam, 0 to 2 percent slopes
Ca	Capay silty clay
Ch	Clear Lake silty clay loam
Ck	Clear Lake clay
La	Lang sandy loam
Lb	Lang sandy loam, deep
Ld	Lang silt loam
Lg	Laugenour very fine sandy loam
Mb	Maria silt loam
Md	Maria silt loam, deep
Mf	Marvin silty clay loam
Mk	Merritt silty clay loam
Mn	Merritt silty clay loam, deep
Mo	Merritt silty clay loam, drained
Ms	Myers clay
Ra	Reiff very fine sandy loam
Rb	Reiff gravelly loam
Rg	Rincon silty clay loam

<u>Symbol</u>	<u>Name</u>
Sa	Sacramento silty clay loam
Sb	Sacramento silty clay loam, drained
Sc	Sacramento clay
Sd	Sacramento clay, drained
Sf	Sacramento clay, deep
So	Sycamore silt loam
Sp	Sycamore silt loam, drained
Ss	Sycamore silty clay loam
St	Sycamore silty clay loam, drained
Su	Sycamore complex
Sv	Sycamore complex, drained
TaA	Tehama loam, 0 to 2 percent slopes
TaB	Tehama loam, 2 to 5 percent slopes
Tb	Tyndall very fine sandy loam
Tc	Tyndall very fine sandy loam, drained
Te	Tyndall very fine sandy loam, deep
Tf	Tyndall silty clay loam
Va	Valdez silt loam
Vb	Valdez silt loam, deep
Ya	Yolo silt loam
Yb	Yolo silty clay loam
Za	Zamora loam

JPR Revised 4/21/80

retyped: 3/27/90

YOLO COUNTY
SOILS OF STATEWIDE
IMPORTANCE

U.S. DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
DAVIS, CALIFORNIA 95616

THESE SOIL MAPPING UNITS MEET THE CRITERIA FOR FARMLAND OF STATEWIDE IMPORTANCE AS OUTLINED IN THE U.S. DEPARTMENT OF AGRICULTURE'S LAND INVENTORY AND MONITORING (LIM) PROJECT FOR THE YOLO COUNTY SOIL SURVEY.

<u>Symbol</u>	<u>Name</u>
HdA	Hillgate loam, moderately deep, 0 to 2 percent slopes
HdC	Hillgate loam, moderately deep, 2 to 9 percent slopes
Mp	Merritt complex, saline-alkali
Oa	Omni silty clay loam
Ob	Omni silty clay
SkD	Sehorn clay, 2 to 15 percent slopes
SmD	Sehorn-Balcom complex, 2 to 15 percent slopes
Sw	Sycamore complex, flooded
Wa	Willows silty clay loam
Wb	Willows clay
Wc	Willows clay, alkali
Wd	Willows clay, alkali, drained
Wm	Willows clay, marly variant

JPR 4/21/80

retyped: 3/27/90

California Department of Conservation
FARMLAND MAPPING AND MONITORING PROGRAM

SOIL CANDIDATE LISTING
for
PRIME FARMLAND AND FARMLAND OF STATEWIDE IMPORTANCE

SOLANO COUNTY

U.S. Department of Agriculture, Soil Conservation
Service, soil surveys for Solano County include:

Soil Survey of Solano County, California,
May 1977

12/18/89

SOLANO COUNTY
PRIME FARMLAND SOILS

U.S. DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
DAVIS, CALIFORNIA 95616

THESE SOIL MAPPING UNITS MEET THE CRITERIA FOR PRIME FARMLAND AS OUTLINED IN THE U.S. DEPARTMENT OF AGRICULTURE'S LAND INVENTORY AND MONITORING (LIM) PROJECT FOR THE SOLANO COUNTY SOIL SURVEY.

<u>Symbol</u>	<u>Name</u>
BrA	Brentwood clay loam, 0 to 2 percent slopes
BrC	Brentwood clay loam, 2 to 9 percent slopes
Ca	Capay silty clay loam
Cc	Capay clay
CeA	Clear Lake clay, 0 to 2 percent slopes
CeB	Clear Lake clay, 2 to 5 percent slopes
Cm	Columbia fine sandy loam
Cn	Conejo loam
Co	Conejo gravelly loam
Cr	Conejo clay loam
Cs	Conejo soils, wet
DaC	Diablo-Ayar clays, 2 to 9 percent slopes
Eb	Egbert silty clay loam
Ra	Reiff fine sandy loam
RnC	Rincon loam, 2 to 9 percent slopes
RoA	Rincon clay loam, 0 to 2 percent slopes
RoC	Rincon clay loam, 2 to 9 percent slopes
Ry	Ryde clay loam
Sa	Sacramento silty clay
Sd	Sacramento clay

<u>Symbol</u>	<u>Name</u>
Sr	Sycamore silty clay loam
Ss	Sycamore silty clay loam, drained
Va	Valdez silty loam, drained
Yo	Yolo loam
Yr	Yolo loam, clay substratum
Ys	Yolo silty clay loam

JPR Revised 10/15/80

retyped: 12/18/89

SOLANO COUNTY
SOILS OF STATEWIDE
IMPORTANCE

U.S. DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
DAVIS, CALIFORNIA 95616

THESE SOIL MAPPING UNITS MEET THE CRITERIA FOR FARMLAND OF STATEWIDE IMPORTANCE AS OUTLINED IN THE U.S. DEPARTMENT OF AGRICULTURE'S LAND INVENTORY AND MONITORING (LIM) PROJECT FOR THE SOLANO COUNTY SOIL SURVEY.

<u>Symbol</u>	<u>Name</u>
AcC	Altamont clay, 2 to 9 percent slopes
AmC	Altamont-Diablo clays, 2 to 9 percent slopes
AsA	Antioch-San Ysidro complex, thick surface, 0 to 2 percent slopes
AsC	Antioch-San Ysidro complex, thick surface, 2 to 9 percent slopes
ClA	Clear Lake clay, saline, 0 to 2 percent slopes
DbC	Dibble-Los Osos loams, 2 to 9 percent slopes
DlC	Dibble-Los Osos clay loams, 2 to 9 percent slopes
Ec	Egbert silty clay loam, occasionally flooded
MnC	Millsholm loam, moderately deep variant, 2 to 9 percent slopes
Om	Omni clay loam
On	Omni silty clay
Sc	Sacramento silty clay loam, occasionally flooded
SfA	San Ysidro sandy loam, thick surface, 0 to 2 percent slopes
St	Sycamore silty clay loam, saline
Su	Sycamore complex, occasionally flooded
Tu	Tujunga fine sand

<u>Symbol</u>	<u>Name</u>
Ve	Valdez silty clay loam, clay substratum
Wc	Willows clay

JPR 10/15/80

retyped: 12/18/89

APPENDIX D
REVISED OPEN SPACE ELEMENT

3 OPEN SPACE ELEMENT

The Greenway concept offers the unifying framework for the Open Space Element of the Davis General Plan. The Greenway concept combines various types of open space including habitat areas, wetlands, recreational spaces, public access paths and trails, and parks to create an organized network that serves a variety of community needs. Among the primary goals of this concept are creation of continuous public open space, the creation of connector greenways or links to connect open space areas, and the enhancement of native vegetation and wildlife habitat. Figure 7A Depicts the Greenway Plan.

The physical elements of the Greenway concept are:

Agricultural Preserve:

- Areas designated Agricultural Preserve are those agricultural lands identified by the City of Davis as permanent agriculture to ensure a permanent buffer between adjacent jurisdictions that will maintain the separate identities of surrounding cities. Agricultural preserves may also denote other areas for permanent open space such as lands within the city limits.

Agricultural Open Space:

- Agricultural open space shall serve to protect valuable natural resources such as Class I and II soils.

Nature Reserve, Wildlife Habitat, and Wetlands:

- The purpose of nature reserves shall be to preserve existing wildlife habitat and develop new wildlife habitat.

Ring Greenway:

- The Ring Greenway lies adjacent to urban development and surrounds the city.
- The Ring Greenway consists of continuous open space with public access and circulation that has minimal interaction with vehicles.
- The Ring Greenway serves a variety of functions, providing public recreation areas, semi-public areas, and buffer areas with no public access.

Connector Greenways:

- Connector Greenways link the outside edge of urban development and activity to outlying nature reserves, wetlands, City recreational facilities, and future regional parks and open space.
- Connector Greenways will often follow natural and manmade drainage channels, as well as existing roadways and utility easements.
- Connector Greenways shall vary in width and include a variety of land uses, including active and passive recreation.

Greenbelts:

- Greenbelts consist of public open spaces within urban development.
- Greenbelts should comprise 10% of the total acreage within new development projects.
- Greenbelt open space provides safe and secure linear parkways and connectors close to residents with convenient off-street bikeways and pedestrian paths.
- Greenbelts connect to the ring greenway, greenstreets, parks, and other greenway elements.

Greenstreets:

- The Greenstreets network utilizes the existing and future bicycle lane and path system.

- The primary goal of these connections is to provide pleasant and safe circulation routes.

Parks and Recreation:

- Park and recreation areas include all existing and future parks, public golf courses, and other public recreational facilities within urban development.
- Park and recreation areas offer traditional park amenities.

Community Infrastructure:

- Primary elements of community infrastructure include flood control, waste water treatment, and landfill facilities.
- These facilities also serve secondary roles as Greenway elements such as Connector Greenways or Nature Reserves.

Four types of open-space lands are identified in the state requirements for the Open Space Element (Gov. Code, Sec. 65560 et seq.): open space for the preservation of natural resources; open space for the managed production of resources; open space for outdoor recreation; and open space for public health and safety. Any action by the City to acquire, dispose of, or regulate the use of open-space lands in any of these categories must be consistent with the Open Space Element (Gov. Code, Sec. 65566).

The four open space types identified above are land functions or roles that encompass the various open space needs of the Davis community. Through the implementation of the Greenway concept, Davis seeks to coordinate these various open space lands to create areas of open space that serve more than one of the identified roles. A single open space area may serve Public Health and Safety goals of providing flood protection, preserve the Natural Resources of wildlife habitat, and provide open space for Outdoor Recreation as a community amenity.

Outlined below are the Open Space classifications and the Greenway elements that will help to meet the community's various open space needs.

Open Space for the Preservation of Natural Resources Agricultural Preserve

riparian, and wetland vegetation in new development where feasible.

Inventory all heritage oaks in the General Plan Study Area.

Inventory replacement oaks (young oaks that could become heritage oaks).

- I. Trees, shrubs, and ground cover plantings in the Greenway landscape shall emphasize those species with the greatest wildlife value.
- J. Manmade nature reserves shall serve flood control and waste water discharge functions as well as provide increased wildlife habitat.
- K. Within urban greenway areas, provide habitat elements (e.g. roosting trees, nesting trees, etc.) for avian species, such as songbirds, hawks, and owls.
- L. Inventory wetland and riparian vegetation within the General Plan Study Area.
- M. Wildlife protection and habitat enhancement should take priority over human use in designated habitat areas.

3.2 OPEN SPACE FOR THE MANAGED PRODUCTION OF RESOURCES

The best soils surrounding Davis are to the east and south; much of this land is under Williamson Act contract as shown on Figure 8. Figure 9 shows soil classifications. The areas of soil types with the greatest limitations are to the north between the present urban area and County Road 29. The north and eastward expansion area designated by the General Plan will increase the committed urban area by about 25 percent, consuming 4 percent of the planning area's remaining open land -- mostly Class I soil.

Agricultural Open Space

Guiding Policies

- A. *Support the Yolo County General Plan goal calling for protection of prime and other agricultural land from urban development.*

The Davis Area General Plan Land Use Element (Yolo County, January 29, 1976) states: "Maintenance of the agricultural economy of the county requires a minimum of urbanization, for the preservation of rich Yolo farm resources and the amenities of open space is, in the long-run, the highest and best use of this land" (p. 2). The City's Plan designates urban uses as needed to accommodate internal growth, and includes an ~~Greenbelt/Agriculture Buffer~~ Ring Greenway to protect agricultural operations.

- B. *Designate lands below 25-foot elevation as floodplain and wildlife habitat to be maintained in agricultural use and wildlife refuge restoration areas.*

Most of the open land in the planning area east of the existing urban area is in this category. See Figure 9.

- C. *Prohibit new residential subdivisions and other urban development in areas designated Agriculture on the General Plan Map.*

This policy supports Yolo County General Plan policy L 14, which prohibits new residential or suburban subdivisions in the agricultural designated areas. (See Land Use Element policies on the greenbelt/agricultural buffer).

- D. *Seek adoption by Yolo County and Solano County of the following open-space preservation policies in their respective General Plans. Open-space uses include agriculture, outdoor recreation, and natural habitat preserves.*

- Maintain open space land uses including outdoor recreation, and natural habitat preserves within the Davis General Plan Planning Area beyond the proposed urban-development boundaries.*
- Support tax and economic incentives that enhance the economic competitiveness of agriculture, and wildlife habitat restoration.*
- Apply or retain land-use controls to protect the scenic rural corridors between neighboring communities.*

- *Encourage voluntary restriction of development through dedication of scenic or conservation easements.*
- *Support activities of nonprofit land trusts and conservation organizations in acquiring development rights to open-space lands by gift or purchase by fee simple title.*

E. Use all available mechanisms for preservation of open space. This may include a fee applied to land annexed to the city.

Available mechanisms for the preservation of open space may include those listed below. These are some of the few methods for assuring that the impact of conversion of prime agricultural land is mitigated to the extent feasible.

- *Open Space Mitigation Fees*
- *Land Dedication*
- *The inclusion of a charge for open space and agricultural preservation within Mello-Roos financing district special taxes, or special assessments.*

The use of these mechanisms will aid in accomplishing the following objectives:

- *Offset the conversion of agricultural or open space land to uses other than agriculture or open space.*
- *Mitigate the impacts of development on existing agricultural lands.*
- *Preserve natural habitats for plants and wildlife.*
- *Preserve the rural character of the area surrounding the City.*

3.3 OPEN SPACE FOR OUTDOOR RECREATION

Parks, greenbelts, and landscaped open space provide recreational opportunities and visual enhancement in the city. Recreation-oriented open space ranges from mini-parks and neighborhood parks to the greenbelts in residential developments, the 28-acre Community Park, and other components of the greenway.

The General Plan revision process provides the opportunity for the Davis Joint Unified School District and the City to coordinate their planning. Each new school is planned to adjoin a neighborhood or district park in order to make the most efficient use of recreation facilities.

Policies on bicycle paths are also found in the Circulation Element. Policies in the Safety and Conservation elements outline programs that the City encourages the School District to include in the school curricula.

The General Plan map designates park and school sites, including existing parks and schools, and proposed sites. Table 6 lists existing parks and recreation areas and Table 7 lists existing and proposed parks and schools.

Neighborhood parks are at least five net acres, allowing adequate area for Little League fields, tot lots, etc. District parks are approximately 15 acres, providing space for adult playing fields, swimming pools or other facilities. Wherever possible, parks are located to serve both new and existing development. Parks typically have been located close to multifamily areas.

Outdoor recreation areas and facilities in the greenway network should offer a variety of experiences and opportunities. The network should include scenic vistas, allow for access to a future regional open space network, and provide educational opportunities where appropriate. The greenway network should enhance opportunities for varied types of non-motorized transportation in and around Davis, and consider the needs of pedestrians, bicyclists, equestrians, and physically limited individuals.

TABLE 6

EXISTING PARKS AND RECREATION AREAS

Central Park

4.9 acres

Mini Parks	8.2 acres
College Park	.9 acre
Cedar	.5 acre
Hacienda	1.0 acre
N Street	.2 acre
Redwood	1.5 acres
Putah Creek	1.8 acres
Village Park	.8 acre
Whaleback Park	1.5 acres
Neighborhood Parks	41.5 acres
Pioneer Park	5.8 acres
Chestnut Park	6.1 acres
Covell Park	5.2 acres
Redwood Park	3.2 acres
Sycamore Park	5.8 acres
Oxford Circle Park	4.0 acres
Westwood Park	6.0 acres
West Manor Park	2.9 acres
Oak Grove Park	2.5 acres
District Recreation Parks	40.0 acres
Community Park	28.0 acres
Slide Hill Park	12.0 acres
Citywide Recreation Parks	151.4 acres
Golf Course	85.0 acres
Landfill Park (partially developed)	66.4 acres
Special Use Recreational Areas and Facilities	76.5 acres
Teen Center (DRB)	.1 acre
Pence Property	.1 acre
Putah Creek Parkway (partially acquired)	65.0 acres
Little League	4.0 acres
Civic Center	7.0 acres
Emerson Tennis Courts	.3 acre
Greenbelts	41.3 acres
Covell Park	34.3 acres
University Village	.7 acre
Green Meadows	6.3 acres

TABLE 7

EXISTING AND PROPOSED NEIGHBORHOOD AND DISTRICT PARKS, AND SCHOOLS BY DATA UNIT

Data Unit	Schools/Grade		Neighborhood Parks/Acres		District Parks/Acres	
	Existing	Proposed	Existing	Proposed	Existing	Proposed
West Davis	Emerson JHS/7-9	New/K-6	Westwood/6.0 ac. West Manor/2.9 ac.			New/15 ac.
North Central				New/7 ac.		
Central Davis	West Davis/K-3 North Davis/K-6 West Davis Intermediate/4-6 Davis HS/ 10-12	New/K-6 (District-owned site)	Covell/5.2 ac. Redwood/3.2 ac. Sycamore/5.8 ac. Oxford Circle/4.0 ac.		Community/28.0 ac.	
East Davis	Birch Lane/K-6 Holmes JHS/7-9		Chestnut/6.1 ac. Oak Grove/2.5 ac.	New/7 ac.	Slide Hill/12.0 ac.	
East Davis/Mace		New/K-6		4/New Total 11 ac.		New/23 ac.
South Davis	Pioneer/K-6	New/K-6	Pioneer/5.8 ac.	New/5 ac.		New/17 ac. New/15 ac.
Core Area					Central/4.9 ac. (includes expansion)	
TOTAL	-----	4 New/K-6	9/41.5 ac.	5/30 ac.	3/44.9 ac.	70 ac.

Nature Reserves, Wildlife Habitat, and Wetlands

Guiding Policies:

- A. Develop public access areas to view wildlife and habitat.

- B. *Protect and preserve existing natural habitat areas within parks.*

Natural habitat areas exist in Landfill and Putah Creek parks. Policies addressing preservation of natural resources in areas other than parks are in the Conservation Element.

- C. *Minimize recreation facilities within natural habitat areas. Design any recreation or interpretive facilities within natural habitat areas to be non-intrusive and site-sensitive.*

Compatible facilities and uses include trails that inhibit traffic in natural habitat areas, benches, and interpretive markers. See also Policy 6.1 C in the Conservation Element.

- E. Provide access to the proposed easterly wetlands preserve along the North Putah storm drain channel.

Ring Greenway

Guiding Policies:

- F. Develop trails network that minimizes conflicts between pedestrians, bicyclists, equestrians.

- G. Develop the Ring Greenway to have segments which vary in overall size and configuration, level of development, and type of intended activity,

- H. Provide informal areas for people, especially children and teens, to interact with nature and natural landscapes.

Connector Greenways

Guiding Policies:

- I. Create new links where access to the existing system is currently lacking.
- J. *Provide a continuous system of on- and off-street interconnected bikeways for recreational use and transportation.*

Figure 10, Bicycle Circulation, shows existing and proposed bikeways. Additional policies on bicycle routes are in the Circulation Element.

- K. Pursue bicycle route connections with neighboring communities. Coordinate planning of these facilities with Yolo and Solano counties.

Greenbelts

In addition to parks, the General Plan designates existing and proposed linear open spaces as greenbelts. Greenbelts of varying width, averaging about 100 feet, include grass, trees, and bike paths. Acreage of existing greenbelts north of Covell Boulevard west of the railroad is 10 percent of the residential area, the ratio expected for greenbelts in new projects.

Guiding Policies

- L. *Require greenbelts in plans for new development areas.*

Greenbelts are schematically indicated on the General Plan map.

- M. *Provide convenient greenbelt access points in all new development.*
- N. *Greenbelts are to be dedicated and improved separately from dedication of park acreage or payment of in-lieu fees as authorized by the Quimby Act (Gov. Code 66477).*

The Quimby Act permits the City to require, by ordinance, dedication of land and/or a fee for park and recreational purposes as a condition of approval of subdivision. All Quimby Act resources are needed to acquire and develop a system of neighborhood and district parks serving new development areas.

Greenstreets

Guiding Policies:

- O. Enhance the existing bicycle network, especially in the vicinity of UC Davis. Work with the University in improving access routes through campus to connect with the greenway network.
- P. Street trees shall be planted to provide canopies and shade on Greenstreets wherever feasible.

City and Neighborhood Parks

Guiding Policies:

- Q. *Acquire and develop parkland that is sufficient to provide, where land is available, a neighborhood or district park within 3/8 mile and a district park within 1-1/2 miles of all dwelling units.*
- R. *Design and locate each new neighborhood park to serve as a visual amenity for the surrounding neighborhood.*
- S. *Use planting schemes that increase habitat values, e.g. use plants known to attract desirable wildlife, in new parks developed within the City limits.*
- T. *Encourage the continued involvement of citizen groups in the planning, construction, and maintenance of park and recreation facilities.*
- U. *Strive for original and innovative park design, both in a functional and visual sense. Encourage the inclusion of park equipment designed by artists.*
- V. *Ensure that all city residents have access to recreation programs and facilities.*
- W. *Expand access to parks by developing facilities for night-time recreation in district parks.*
- X. *Protect and preserve existing natural habitat areas within parks and incorporate natural habitat areas into future city parks.*
- Y. *Locate each new neighborhood park near the center of the neighborhood*

that it will serve.

- Z. Do not allow land that is not suitable for building to be counted toward fulfilling parkland dedication requirements.*
- AA. Provide adequate shade and wind protection in parks by using various landscaping techniques and constructed elements including:*
 - Trees for shade and wind protection.*
 - Fast- and slow-growing shade trees should be intermixed to provide shade in parks in the near term, as well as in the future. Tree rows for wind protection also provide a visual screen that aesthetically enhances the park environment.*
 - Shade structures including arbors, lattice-work canopies, and trellises.*
- BB. Develop standards for night-time activities and facilities, including lighting, that minimize impacts on surrounding residential areas.*
- CC. Design parks to be accessible by pedestrians and a variety of transportation modes including car, bus, and bicycle.*
- DD. Provide facilities within neighborhood parks that will meet the needs of nearby residents, as determined by the Neighborhood Park Planning Committee for that neighborhood.*
- EE. Provide park facilities in District Parks that will meet the needs of specific-interest groups and of city residents as a whole.*
- FF. Encourage the location of child-care facilities on or near park sites.*

3.4 OPEN SPACE FOR PUBLIC HEALTH AND SAFETY

Land within one mile of the landfill site is designated as Open Space for Public Health and Safety. The General Plan Map shows a "landfill-related use restrictions" designation for this area. Residential development within this area is prohibited due to public-health concerns, such as vectors, and because of odor. Airports also are prohibited in this area because of the hazard posed to aircraft by the large number of sea gulls that congregate in the area of the landfill.

Ring Greenway

Guiding Policy:

- A. *In order to allow efficient cultivation, pest control, and harvesting methods to be employed on agricultural land, require those property owners wishing to develop to provide a buffer or other means of mitigating the adverse effects of urban development on adjoining agricultural land.*

Community Infrastructure

Guiding Policy:

- B. Treated waste-water, storm water discharge, and their related facilities should be utilized for nature reserves, wildlife habitat, and wetlands.
- C. Drainage courses should be given more aesthetically pleasing names rather than referring to them as "Channel A or Channel B."
- D. Community Infrastructure facilities also serve secondary Greenway functions. Habitat values shall be considered when developing management plans for these areas.

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APPENDIX I

RECOMMENDED NATIVE WOODY PLANTS FOR PLANTING THE DAVIS GREENWAY SYSTEM

City Parks and Greenbelts

<u>Trees</u>		<u>Remarks</u>
California sycamore	Plantanus racemosa	CV
Coast live oak	Quercus agrifolia	S, EV
Valley oak	Quercus lobata	F, CV
 <u>Shrubs and Vines</u>		
Ceanothus	Ceanothus spp.	EV
Toyon	Heteromeles arbutifolia	EV, CV
Western redbud	Cercis occidentalis	Fall, CV

Riparian Habitats

(moist conditions or seasonal flooding)

<u>Trees</u>		
Boxelder	Acer negundo	CV, F, Fall
California bay	Umbellularia californica	EV, S
California buckeye	Aesculus californica	S, CV
California sycamore	Platanus racemosa	CV
Coast live oak	Quercus agrifolia	S, EV
Fremont's cottonwood	Populus fremontii	CV, F
Interior live oak	Quercus wislizenii	EV, S, CV
Oregon ash	Fraxinus latifolia	CV, F, Fall
Valley oak	Quercus lobata	CV, F, S

Shrubs

Arroyo willow	Salix lasiolepis	CV, F
Blackberry	Rubus vitifolius, R. parviflorus	CV, F CV, F
Buttonwillow	Cephalanthus occidentalis	Fall, F
California wild grape	Vitus californica	CV, F
California wild rose	Rosa californica	CV, F
Elderberry	Sambucus mexicana	CV
Goodding's willow	Salix gooddingii	CV, F
Gooseberry	Ribes malvaceum, R. sanguineum	
Mule fat	Baccharis viminea	F, CV
Smooth willow	Salix laevigata	CV, F
Western rebud	Cercis occidentalis	Fall, CV
Yellow tree willow	Salix lasiandra	CV, F

Other Natural Areas

(relatively dry conditions)

Upland Shrubs

Ceanothus	Ceanothus spp.	EV, CV
Coffeeberry	Rhamnus californica, R. crocea var. ilicifolia	EV, CV
Elderberry	Sambucus mexicana	CV
Flannelbush	Fremontodendron spp.	EV
Manzanita	Arctostaphylos spp.	EV
Scrub oak	Quercus dumosa	EV, S, CV
Toyon	Heteromeles arbutifolia	EV, CV
Western rebud	Cercis occidentalis	Fall, CV, S

Upland Trees

Blue oak	<i>Quercus douglasii</i>	CV
California buckeye	<i>Aesculus californica</i>	CV,S
Foothill pine	<i>Pinus sabiniana</i>	EV, CV

F = Indicates high tolerance of flooding

S = Can be direct seeded successfully

CV = Central Valley native

EV = Evergreen

Fall = Notable fall color

APPENDIX II

SPECIAL-STATUS WILDLIFE SPECIES THAT ARE KNOWN OR HAVE POTENTIAL TO OCCUR IN THE DAVIS GENERAL PLAN AREA

<u>Species</u>	<u>Legal Status (a) Federal/State</u>	<u>Preferred Habitats</u>	<u>Occurrence in the General Plan Area</u>
Valley elderberry longhorn beetle	FT/	Elderberry shrubs in riparian habitats	Found along Putah Creek at Solano Lake Park. Potential habitat exists along Putah Creek in the General Plan area.
<u>Reptiles</u>			
Giant garter snake	FC/ST	Marshes, ditches with emergent wetland vege- tation and adjacent uplands	Potential habitat exists along irriga- tion canals, drainage ditches or other waterways in the Davis area. Three records exist for the Davis area.
<u>Birds</u>			
Black-shouldered kite	/CFP	Herbaceous fields for foraging; riparian woodlands and scrub for nesting	Common residents in the Davis area. Nest along Putah Creek and Willow slough.
Northern harrier	/SSC	Dense, tall grasslands or seasonal marsh for nesting; grasslands and marsh for feeding	Common resident in the Davis area. Less common during the summer.
Sharp-shinned hawk	/SSC	Riparian and oak wood- land	Uncommon winter visitor.
Cooper's hawk	/SSC	Riparian and oak wood- land	Potential breeding habitat along Putah Creek and Willow slough. More common during the winter.
Swainson's hawk	/ST	Large trees for nesting; alfalfa, hay fields, grasslands for feeding	High concentration of nesting pairs in the Davis area, particularly along Putah Creek and Willow Slough.

<u>Species</u>	<u>Legal Status (a)</u> <u>Federal/State</u>	<u>Preferred Habitats</u>	<u>Occurrence in the General</u> <u>Plan Area</u>
Mountain plover	FC/	Freshly plowed fields for feeding and resting	Irregular winter visitor.
Long-billed curlew	FC/	Herbaceous fields, plowed fields for feeding	Common winter resident. Uncommon during the summer. Do not nest in the Sacramento Valley.
California gull	/SSC	Widespread in winter	Common non-breeding resident. Less common during the summer.
Burrowing owl	/SSC	Natural or artificial burrows for nesting; grasslands and agricultural fields for feeding	Declining in the Davis area. Several breeding pairs occur in the Davis area.
Short-eared owl	/SSC	Dense grasslands and marshlands for nesting and feeding	Nested in 1983 at the Davis Audubon-Hunt Wesson Hawk and Owl Preserve at Road 102 and Road 28H. Uncommon winter resident.
Tricolored blackbird	FC/	Emergent wetlands for breeding; marsh, grasslands and agricultural fields for feeding	Irregular winter resident; potential breeder in the Yolo Bypass.

(a) Legal status definitions

Federal

FT = Federally listed as threatened

FC = Federal candidate for threatened or endangered list

State

ST = State listed as threatened

SSC = California species of special concern

CFP = California fully protected

APPENDIX E
BIOLOGICAL ASSESSMENT

INTRODUCTION

Background and Objectives

The City of Davis is in the process of revising the Open Space designations and management goals for the 84 square mile envelope that surrounds the city. The emphasis is to create additional open space features that would provide greenbelt conditions along pathways and drainageways in and around the city. A major impetus for this effort is the funding for conservation issues provided by the passage of Proposition 70 in 1988. The goals of the revision include the creation and extension of recreational trails and greenways, plus the creation/restoration of natural habitats for plant and animal species of concern. This report represents an analysis of the revised open space designations, particularly as it would affect plants and animals in the study area.

Methods

This biotic study was primarily a literature review and data collection investigation regarding what sensitive biotic elements occur in the study area and the impacts they would incur given the proposed changes in general land use and open space management in particular. Historic locations for sensitive plant and animal species were obtained from the California Natural Diversity Data Base [CNDDDB], the California Native Plant Society [CNPS], and other relevant references for the region (e.g., Smith and Berg 1988). Baseline information was compiled and mapped on an air photo of the study area. Published literature regarding the species of concern for this area was reviewed, and the proposed actions and their effects of the revised plan were evaluated. The Yolo Basin Wildlife Area Concept Plan was reviewed and biologists from CNDDDB, CDFG, FWS, and the Audubon Society were contacted regarding the species of concern in this region, the project, its potential impacts, and the opportunities for enhancement. Additional specific recommendations (to minimize adverse impacts and/or enhance the positive ones) are made with respect to certain parts of the revised plan.

Study Area

The study area consists of a large, relatively flat expanse of valley-bottom land in and around the City of Davis. It includes the city itself, the local campus of the University of California, and extensive agricultural land. It also contains numerous roadways (including Interstate 80 and State Route 113), a major railroad line, and significant residential development. The area has been almost completely altered from its pristine condition, including the re-routing and confinement of its primary hydrologic feature, the lower section of Putah Creek. Virtually all of the non-urbanized land within the study area is currently used for agriculture. Only the most difficult areas to develop (e.g., floodplains, major streams, and seasonally flooded places) are left less than intensely developed.

EXISTING CONDITIONS

General Vegetation and Plant Communities

The pristine valley landscape that once existed in this area was predominantly a mosaic of native valley grassland types, with small groves and scattered individuals of valley oak (*Quercus lobata*) and strips riparian woodland (cottonwood, willow, oak, sycamore) along the drainageways. In fact, Kuchler (1977) shows an extensive riparian forest up to several miles wide centered on Putah Creek in his map of potential natural vegetation. The open grassland consisted of needlegrass prairie, alkali or lowland swales (sacaton grassland), and marshy communities of bulrushes, cattails, and rushes in the lower wetter places. Extensive emergent marsh occurred over much of what is now the Yolo Bypass. Shrubby vegetation was most likely sparse away from the riparian corridors, but there were probably some significant thickets of elderberry, willow, native blackberry, and other riparian plants in the lowlands and along watercourses (creeks, sloughs, and

natural floodplain levees).

Through the area's long history of grazing, grain production, orchards, row crops, and livestock production (plus residential and commercial development), the site's natural vegetation has long since been removed. With all the soil disturbance and agricultural activities, there has also been a substantial invasion of roadsides, ditchbanks, and generally peripheral areas by non-native plant species.

While the degree of disturbance and removal of natural vegetation in the study area has been extreme, there are still a few areas where such plant life persists. It is neither extensive nor of high quality, but it represents an example of what was once common and abundant, plus it still provides some resource value to remnant wildlife. There is virtually no significant natural grassland left, and the most natural areas include the riparian communities along the Putah Creek overflow channel, marshy pockets along scattered sloughs and ditches, and a remnant oak savanna at the proposed Sykes Slough Nature Reserve. None of these areas are completely pristine in character and the plant species richness is undoubtedly lower than under pre-development times.

Habitat Quality and Wildlife Use

Just as the natural vegetation has declined, so has the wildlife. The study area still supports sparse resident communities of urban- and agriculture-adapted wildlife (songbirds, skunks, raccoons, rodents, rabbits, etc.) and provides seasonal resource values to migratory birds, but because of the extensive residential and agricultural development, there is very little natural habitat left. The few areas of natural vegetation that remain are invaded to some degree by non-native species (both plants and animals), and are surrounded by intense non-natural land use.

The main feature of natural habitat value is the Putah Creek corridor. In spite of the narrow, linear nature of this corridor and the encroachment of agriculture, the substantial water that still flows within a relatively undisturbed bank system supports a relatively well developed riparian community. This area in particular still provides meaningful resource values for a number of native species of plants and animals. Other areas where relatively natural habitat conditions still exist include portions of Willow and Dry sloughs and the proposed Sykes Slough reserve. Some important wildlife use also occurs in areas of non-natural habitat, such as the use by burrowing owls of manmade levees and road embankments, and the foraging of swainson's hawks in low-growing agricultural croplands.

Wildlife use overall in the study area has diminished severely over the years. No longer do tule elk, grizzly bears, or other large mammals roam the valley floor. Nor do the vast flocks of waterfowl and other migratory birds frequent the marshes and wetlands of the historic valley landscape. Even many of the urban-tolerant species that still remain in the valley have suffered significant declines in numbers because of the land use changes. Bird species dependent upon riparian forests, wetlands, and dry grasslands have suffered significant declines, both regionally and statewide. The study area is situated in a strategic position in the Pacific Flyway, a major migration route for waterfowl and other birds. Although it currently has little natural habitat for such species, this location plus the natural endowment of water (Yolo Bypass and Putah Creek) give it high potential for natural community restoration.

Sensitive Biotic Features

Plants. The pristine valley landscape once supported vast expanses of herbaceous grasslands. While the plant species that composed these communities are still relatively common and widespread, their local representation is extremely scarce. Because of this historic depletion (not just here, but throughout much of the Central Valley), these valley grasslands are now regarded as sensitive. Native grasslands are regarded by CNDDDB as sensitive resources worthy of protection where still extant. Some native grassland might still be present in the Putah Creek corridor or at the Sykes Slough reserve.

Also, within the overall grassland mosaic were small isolated depressions in the valley plain that

represented what are now known as vernal pools or hog wallows. These shallow pools provide an unusual habitat for plant growth by filling with water in the winter, staying relatively wet (if not completely inundated) through the early spring, and then slowly drying through evaporation. The procession of flowering plants that grow in the concentric zones as the pools dry is a remarkable feature of the pristine California landscape. These small pools have also come to support a variety of specialized plants that are confined to such habitats and represent some of the state's most restricted and depleted species. The vernal pool floras of the Central Valley include rare species both of recent (geological) origin as well as some that have become rare through increasing agricultural and residential development. Vernal pools and their associated topography are extremely vulnerable to urban sprawl and normal agriculture. However, many such pools are compatible with moderate levels of livestock grazing (particularly horses).

The study area contains almost nothing of the region's pristine representation of vernal pools, or the unique plants that grow in them. There is one particular species of high concern (it is listed by both the state [CDFG 1988] and the U.S. Fish and Wildlife Service [FWS 1985]), the palmate bird's-beak (Cordylanthus palmatus), that occurs within two miles (to the north) of the project area. This species is adapted to saline/alkaline, seasonally flooded habitats, and is known from only about six locations (from Colusa to Fresno counties). The valley's natural vernal pools included saline pools as well as completely freshwater ones depending on parent soils and water sources, both of which probably occurred in the study area. Each type represents an unusual, declining habitat that provides suitable conditions for a number of restricted and/or rare species. The invertebrate faunas that are associated with these habitats are also often somewhat unusual.

Some of the other plant species that could be expected to occur in vernal pools or alkaline sinks in this region (but which are not currently known here) include Crampton's tuctoria (Tuctoria mucronata, a state and federally-listed grass species that is known only from the Jepson Prairie at Dozier), Colusa grass (Neostapfia colusana, another small grass restricted to vernal pools), and several other species of lesser concern (i.e., legumens [Legenere limosa], dwarf downingia [Downingia humilis], Bogg's Lake dodder [Cuscuta howelliana], and Parish's saltbush (Atriplex parishii, an endemic shrub of saline/alkaline sinks, chenopod scrub, etc.).

Other sensitive plants that could possibly have been present in historic habitats in the study area include California hibiscus (Hibiscus californicus, a showy herb of Central Valley marshes, tidal sloughs, and other waterways [including some agricultural ditches]), fragrant fritillary (Fritillaria liliacea, a lily found in heavy soils and on serpentine), the delta coyote thistle (Eryngium racemosum, an annual herb found on seasonally inundated floodplains), and the slough thistle (Cirsium crassicaule).

While there are no documented natural vernal pools or associated sensitive species within the study area (CNDDDB 1990, CNPS ongoing), there are still a few areas that may provide suitable conditions for same. The underlying soils are extremely important in determining whether or not a vernal pool will develop, and some areas which contain suitable claypan soils may still represent potential sites for such resource features. A small demonstration project located in the Highway 113/80 interchange has effectively re-created vernal pool conditions through careful grading, clay layering, and compaction. After one year of results, these experimental pools appear to be holding water and functioning adequately to support some of the more common vernal pool plants. This type of project shows some of the potential for restoring such habitats in this region.

The one plant species that is reported as occurring in the study area (CNDDDB 1990) is the serpentine sunflower (Helianthus exilis), mapped at one location along the railroad just north of the city of Davis. This species is an annual sunflower that has neither state or federal status, but which is on List 4 of the CNPS rare plant inventory (Smith and Berg 1988). It is also reported as occurring along the unnamed slough just south of Dry Slough, just west of the study area's western boundary. However, given this species' similar appearance to H. bolanderi, and its preferred habitat of serpentine, it may be that the local plant is, in fact, not H. exilis. (This situation warrants additional research.)

Wildlife. There are numerous wildlife species that were historically known to occur in the region (some common and locally abundant) that are either seriously depleted or no longer known

here. Many are regarded as sensitive and are afforded some level of protection. Historic habitat conversion and general disturbance have all but eliminated many species from the study area (and the Central Valley in general). The following are brief accounts of wildlife species historically reported from this area, some of which still have at least some representation here:

Swainson's hawk (Buteo swainsoni) - The swainson's hawk was once a common breeding bird in California, ranging virtually throughout the state. It returns annually to breed in selected areas in the Central Valley and the Modoc Plateau. It prefers open grasslands and non-wooded lowland valleys, but prefers to nest in tall, somewhat isolated riparian trees. This hawk preys on California voles and other rodents, large insects, and other small animals found in open dry grassland, pasture, and selected low-growing crops. It appears to need visual contact with prey items, and tall crops such as corn and even mature winter wheat are not considered good habitat. Alfalfa is actually highly rated as foraging habitat because it is kept fairly low by frequent harvesting and tends to support good rodent populations. The swainson's hawk nests in taller trees, generally on the edge of and overlooking suitable open foraging territory. It needs a relatively large amount of terrain, and CDFG recommends 1200 contiguous acres as the minimum suitable foraging area.

This hawk has declined significantly throughout the state (Remsen 1978), largely because of the conversion of valley grasslands to crops and urban development, as well as from shooting, indiscriminant harrassment, and general habitat disturbance. Pesticides and degradation of their South American wintering grounds may also be factors. The statewide population of this species was apparently on the order of 17,000 pairs around 1900 and is now believed to be less than 600 pairs (CDFG 1989). One of the primary remaining use areas for this species is the general Davis-Woodland area where significant nesting activity still occurs (Estep 1989). The study area in particular has several nest locations cited on Willow and Dry sloughs. Some 20 pairs were reported by Estep (1989) from his Woodland study site (largely within the Davis open space study area), in spite of the fact that only about 1 percent of the region's land is good pasture habitat.

Burrowing owl (Athene cunicularia) - This small owl has suffered dramatic declines throughout the state, with factors such as loss of habitat (conversion of grasslands to crops), declines in ground squirrel populations, pesticides, and roadside maintenance operations being influential. While this species is still known from many parts of the state, its numbers continue to decline (Remsen 1978) and only a few populations are protected in the state and federal wildlife refuges (e.g., San Luis and Mendota). This species is especially vulnerable to disturbance because of its habit of nesting in burrows in the ground. Such features as natural banks, man-made levees, and road embankments are often used which places these birds in very close proximity to humans and their associated activities (e.g., maintenance, bank modifications, and the general presence of humans and domestic pets). This small ground dweller is especially vulnerable to vehicular damage to burrow areas and harassment by pets. It is also sensitive in that its seasonal period of high vulnerability (nesting and fledging) can be as long as 6 or 7 months (March to October)

Western yellow-billed cuckoo (Coccyzus americanus occidentalis) - This bird (state-listed, Endangered) was also much more common in California before the vast Central Valley riparian forests were cleared. It is currently extremely scarce in the state as a breeding bird and has been all but eliminated from entire regions (including the study area) due to the loss of riparian forest habitats. While this species has apparently not been reported as breeding in the actual study area for many years, it was undoubtedly present historically and might be expected to return if sufficient riparian habitat were present. This secretive bird is highly restricted to large (at least 25 acres), dense patches of riparian forest and woodland.

Northern harrier (Circus cyaneus) - This raptor, also known as the marsh hawk, was once much more common in the state as a breeding bird, but has suffered significant declines over the years, largely due to wetland and grassland habitat conversion. This bird

appears to be somewhat tolerant of rural and agricultural land uses, but has been hard hit by the historic loss of marsh (foraging) habitat. It may also be vulnerable to grazing since this is a ground nester, typically in open grasslands and valley scrub. This species still occurs in the study area and is able to find suitable foraging areas here (including agricultural fields similar to those used by the Swainson's hawk). Wintering populations are larger than those breeding here, but these too have declined seriously since the early part of the century. The remaining breeding colonies are located primarily in wildlife refuges in the Central Valley.

Giant garter snake (Thamnophis couchi gigas) - This snake is known from slow moving waters, sloughs, ponds, canals, and ditches in the general Central Valley. It grows to over 4 feet in length and is one of the more aquatic of the garter snakes (CDFG 1980). It was historically known from virtually the entire San Joaquin Valley, generally from Sacramento to the Tulare Lake basin. It is currently believed to be extirpated from the southern part of this range and is threatened by increasing agricultural and residential development, draining of wetlands, and general loss of habitat. Some suitable habitat has been created along agricultural ditches and canals, but good emergent marsh vegetation is needed to represent good habitat. It has been reported from within the study area at Willow Slough (CNDDB 1990).

Valley elderberry longhorn beetle (Desmososerus californicus dimorphus) - This is a federally listed beetle that lives its larval stages in the soft shoot tissues of the native elderberry (Sambucus caerulea and/or mexicana). Because of the historic depletion of the valley's riparian forests and thickets, this insect has also declined drastically. The Davis study area is within the historic range of this species and may well contain current colonies. This species has been reported from the Putah Creek corridor to the west of the study area as well as in the northern San Joaquin and southern Sacramento valleys. Small elderberry stands are known from within the Davis study area, primarily along the Putah Creek overflow corridor and possibly along the lower section of Willow Slough.

Other species - While there are a few other sensitive wildlife species that still occur here (such as the northern harrier [marsh hawk] and the black-shouldered kite), the study area historically provided suitable habitat conditions for a number of other species that are known to be depleted, extirpated, or declining. The study area could still support some of these species if such habitats were once again made available. The following are some of the rarer species that could possibly be expected:

- willow flycatcher (Empidonax traillii); riparian woodland, etc.
- yellow warbler (Dendroica petechia); riparian woodland, etc.
- yellow-breasted chat (Icteria virens); riparian woodland, etc.
- Aleutian Canada goose (Branta canadensis leucopareia); seasonal wetlands
- bald eagle (Haliaeetus leucocephalus); seasonal wetlands, floodplains, riparian

Habitats and Natural Communities. Because of the severe alteration of natural landscape in the study area, there is little that remains regarding sensitive or important natural habitats and communities. The vernal pools and native bunchgrasses that once occurred on the gentle valley plain are essentially gone at the hands of grading, disking, paving, and cropland. Most of the historic riparian vegetation is also gone, the result of long term wood cutting, creek channelization, upstream water diversion, and general disruption of riparian corridors. However, since the basic feature that supports riparian vegetation, water, is still present in the study area, there are some areas that have come to support minor riparian resources. In particular, the Putah Creek overflow channel (now the main channel for high runoff) supports some riparian vegetation; unfortunately, there simply is not adequate space to foster a large enough riparian community to be of importance to sensitive wildlife species. Likewise, the numerous small sloughs and agricultural ditches provide some habitat for selected species (both herbaceous riparian or marsh plants and some wildlife species), but these features are so constricted and disturbed that good ecological communities and/or relationships cannot develop fully.

The study area does contain some features of significance, however, including the Putah Creek corridor (riparian woodland), Dry and Willow sloughs (sluggish water, nest trees), and the Sykes Slough area (grassland and oaks). As vegetation alone, these features are not particularly significant, but given the long history and degree of depletion of these resources in the region, they represent important remnants of the natural landscape. As such, they should still be preserved and could be used to provide a basis for future restoration and expansion of similar conditions.

In spite of the fact that most of the region's natural communities and habitats have been destroyed, the water-related features still hold good potential to someday become valuable resources. The fact that some provision for runoff and drainage must be made within the overall residential/agricultural mosaic indicates that areas could be created where water will be allowed to flow in above-ground channels and support natural vegetation. Therefore, while the current expression of riparian communities is relatively minor and the physical habitats are largely constricted by adjacent agricultural uses, the basic resource feature, water, still remains in the area and has potential to once again support natural communities.

IMPACTS OF THE PROJECT

General Vegetation and Plant Communities

Impacts to general vegetation from the proposed open space revisions would have essentially no adverse effects and could have a net positive result. By adding land currently under agricultural land use to designations of greenbelt and wildlife habitat, the end result would be to provide more space for natural vegetation. The plans could even include planting of native vegetation which would add significantly to the study area's existing total. Given the meager existing representation of natural vegetation, this proposed action could end up being a significant positive impact. There may be minor disturbance to small areas of naturalized vegetation (i.e., annual grassland), but this is not regarded as a significant impact as long as the area involved is small (a few acres at most).

The proposed land use changes would involve several different habitat types, including marshes and seasonal wetlands, riparian forest, and valley grassland. The resultant natural vegetation would be representative of the region's pristine environment and could become a substantial resource for wildlife once implemented.

Habitat Quality and Wildlife Use

Because of the historic depletion and currently degraded condition of the study area's natural communities, plus the unique goals of the proposed project, the net impact on wildlife habitats and plant communities should be quite positive. There will be some ground disturbance and presumably at least some vegetation removal attendant to the construction of trails, greenways, etc., but this is not likely to affect the area's few remaining natural habitats. The degree of direct impact could be substantially reduced, if not completely eliminated through careful planning around known sensitive features and the cessation of construction activities during critical seasons. The design and implementation should have the flexibility to avoid/incorporate specific trees or other features currently within the open space pattern.

Some temporary adverse effects on breeding birds could be expected wherever significant construction activities take place, but these can be avoided through appropriate timing. Also, the introduction of human activities (with pets) in previously unvisited places will have a potentially negative impact, particularly during construction. Certain secluded sites along Putah Creek, Willow Slough, or levee areas near the Yolo Bypass may experience greater human disturbance.

Once the project's physical creation is begun, the resultant plantings, easements, and habitat restoration will benefit wildlife almost immediately. Ultimately, when the project is completed, it should have a highly significant positive impact on the overall natural ecology of the region, both for common species and the rare, individuals and communities. This would include benefits for

common species by providing additional usable habitat, providing movement routes, and increasing the food base. Sensitive wildlife species will also benefit through the restoration and dedication of additional lands as wetland and/or grassland habitats. Raptors and migratory birds would benefit from the increase in foraging habitat, and some species which may not currently use the area may in fact come to use it. Given the size of the eastside habitat/wetland refuge, there is the potential for significant benefits to waterfowl, waterbirds, and many other migratory birds. Based on the preliminary concepts for units A and B (in the Davis study area) of the evolving Yolo Basin Wildlife Area plan, the ultimate mix of permanent and seasonal wetlands, riparian plantings, open dry grassland, and selected agriculture should provide an appropriate vegetation mosaic to significantly improve the region's and the state's valley-dependent wildlife resources.

Sensitive Biotic Features

Plants. It is not likely that any sensitive plant species will be directly affected by the project. No known rare plant locations will be affected and the proposed revisions do not specifically involve such species. However, the impact on at least one species of secondary concern, the valley oak, may receive positive impacts from the plan. New areas of preservation (i.e., Sykes Slough Reserve) would include valley oaks, and much of the other created greenways and habitat areas would undoubtedly come to support these trees. Also, many valley oak seedlings will probably be planted in the greenways and habitat preserves.

While the impacts would be positive but relatively minor for sensitive plants, the project has the potential to include relatively significant beneficial impacts to same in the future. By setting aside areas for natural vegetation and habitat, there will be a possibility created that some of these areas could be restored to include vernal pool conditions. These reserve areas could eventually be planted with vernal pool species, including several of limited occurrence and distribution. If this aspect of natural habitat restoration is pursued, the project could ultimately have a significant positive impact on sensitive plants by expanding the range and/or increasing the population sizes of several species.

Wildlife. Direct impacts to sensitive wildlife species will be relatively minor, although with new habitat creation and/or dedication the result could significantly benefit some species such as the swainson's hawk and the giant garter snake. No adverse impacts are expected, and the designation of substantial lands as wildlife habitat would increase the resource base for sensitive species (particularly birds). In particular, the corridor along Putah Creek has the potential to become a much more diverse and extensive riparian system (possibly even to the point of being suitable for yellow-billed cuckoos), and the extensive agricultural lands in the eastern part of the study area have good potential to foster seasonal wetlands and valley grassland (to the benefit of waterfowl, raptors, and migrating birds). If designed and managed to include areas of dry grassland and alfalfa, the result could include substantial benefits to the swainson's hawk. Also, if the Sykes Slough Nature Reserve and Putah Creek corridor are upgraded to include additional native trees and grassland, this would provide significant additional habitat for sensitive species. All together, the proposed action's end results could include a significant positive impact on the region's depleted sensitive wildlife.

Habitats and Natural Communities. Since there is little sensitive habitat left in the area, the proposed open space revisions would have little or no adverse impacts to these resources. However, through the dedication of additional land to specific habitat conservation and management, the project has the potential to significantly benefit such sensitive communities as riparian, valley grassland, and seasonal wetlands. The actual degree of enhancement and resource benefit will depend, however, on the degree to which active restoration is accomplished and the ultimate amount of land dedicated to each use (grassland, crops, riparian, wetland, etc.). Left to natural dispersal and colonization, the new open space designations would eventually come to support a weedy mixture of common naturalized and some native plants, and would provide some general benefits to wildlife. With a more active approach, including selective site preparation (restoration of drainage patterns, removal of weeds, etc.), planting of native species, and long term management (weed control, vehicle restrictions, supplemental planting), these areas could be significantly enhanced and could come to support sizable new areas of good natural habitat. In

particular, valley oak savanna, vernal pools, riparian corridors, and seasonal wetlands could all be upgraded and expanded.

MITIGATION MEASURES

General Vegetation and Plant Communities

Because the net effect on general vegetation should be positive, there is no need for mitigation to reduce impacts. On the other hand, however, there are measures which if implemented would greatly increase the value (especially in the short range) of the overall open space land. Such actions as planting native trees (valley oak, cottonwood, box-elder, walnut), shrubs (elderberries, willows, blackberry), and grasses (*Stipa*, *Elymus*, *Hordeum*, *Sporobolus*) would greatly increase the habitat values. Individual trees could be used as specimens along greenways and larger stands could be planted along the Putah Creek corridor and on higher ground in the wildlife refuge. The most successful effort would require relatively intensive short term management (protection, supplemental grading and/or planting, monitoring), but would mature into a naturally adapted, drought-tolerant, low-maintenance woodland. Figure 1 shows a conceptual planting design for the study area's greenways and linear open space elements.

Habitat Quality and Wildlife Use

Since there is not much sensitive habitat left in the area, and little is anticipated in the way of disturbance to existing vegetation, the proposed open space revisions would have little or no adverse impacts to these features. Therefore, no significant mitigation is needed. However, areas to be dedicated to habitat/wetland should be planted with a mixture of natural communities in order to obtain the best response from wildlife. Also, while it does not represent natural habitat, the existing resource provided by cropland and pasture for swainson's hawks should be preserved. No major land use changes should be allowed in the northwestern quadrant of the study area, even in just the type of crop being grown, until an analysis of its effect on the hawks is made. Incentives should be instituted to increase or optimize the proportion of suitable habitats present in this area. CDFG recommends alfalfa (40%), dry pasture or native grassland (20%), disked fields with hedgerows (20%), and row crops (20%) as a cover mix suitable for swainson's hawks.

Sensitive Biotic Features

While a major part of the project's role is to improve the situation for native plants and animals, there is also the potential for some adverse impacts to occur in the process. A few mitigation measures are recommended, and additional suggestions are made on ways to optimize the biotic response. First, each natural habitat reserve should have a detailed plan prepared which identifies the site-specific goals to be met, the actual grading and planting design, the implementation schedule, and provisions for protection, management, and monitoring. Second, the existing vegetation and habitat conditions that do provide valuable resources for sensitive species should be preserved. The ultimate result may be a much more well developed habitat mosaic, but until that has been completed it will be essential to retain what small habitats and critical features remain.

Plants. No specific mitigation is required for sensitive plant species. However, surveys of the reported *Helianthus* site and of the Sykes Slough Nature Reserve should be made before any ground disturbance occurs there. Other recommendations include the following:

The City shall use native species (trees, shrubs, and groundcovers) to the extent possible in the major greenbelts and connectors. A detailed planting design will be prepared prior to the implementation of each element showing the proposed trail and facility design, plus what areas are to be restored to semi-natural conditions, the plant species that will be used, and ultimately a detailed planting layout. A monitoring plan and provisions for supplemental planting efforts will be included.

The City shall include natural grassland and vernal pool restoration efforts in the Sykes Slough area. The possibility of introducing sensitive vernal pool plants will be explored with CDFG.

The City shall consider the possibility of creating alkaline/saline sink habitats the wildlife habitat designations. The possibility of introducing sensitive saline habitat plants (Cordylanthus, Atriplex) should be considered. Areas of potentially suitable soils (saline/alkaline) in the eastside wildlife areas will be explored, with at least a feasibility report being prepared addressing the probability of success for such an effort.

The City shall strive to protect existing valley oaks within the open space and utilize this species as much as possible in the greenbelts. Valley oaks in particular should be used in general open space plantings since this is the primary tree species indigenous to the valley floor.

Wildlife. The main mitigation for potential adverse impacts to sensitive wildlife would be to retain all existing natural or otherwise important vegetation (at least until its role in supporting wildlife could be evaluated), and avoiding direct disturbance to nesting habitats during the critical seasons. Sites known to support burrowing owls and swainson's hawks should be the subjects of detailed siting surveys to place facilities in such a manner as to avoid direct impacts. All construction activities around these locations should be timed to avoid critical nesting periods. Public access to certain prime habitat locations should be re-evaluated with possible alternatives explored.

Swainson's hawk - Care should be taken not to drastically alter the existing situation for this species, even though the current conditions are far from perfect. In particular, the presence of mature trees along Willow and Dry sloughs is probably critical to this species continued presence in this area. Protection of the existing trees and the nests they contain is of very high importance. Also, all construction in this area should be delayed until after the breeding season (typically March to June). A qualified biologist (preferably an ornithologist) shall be used to determine when the local nesting activity is beyond the vulnerable period. Human access and its effect on the birds, as well as the proposed facilities should be evaluated by local bird experts. The local connector routes to Woodland should be constructed to be as narrow and unobtrusive as possible. No public access should be allowed along these sloughs. Additional cottonwood trees should be planted at selected locations in the greenbelt and along the Willow Slough Bypass (if possible) to help provide new nest trees in the future.

Burrowing owl - Dens that are known to be active should be completely avoided by major construction activities. This could be from March to as late as September. Areas of suitable den habitat (levees and riverbanks, some road embankments) should be incorporated into the open space design as areas to protect and skirt around if at all possible. Trails, bicycle paths, and other areas that will receive extensive use should be routed away from the den sites. Sections of trails that cannot significantly avoid dens should be protected from vehicles by at least a low fence or other barrier, if not completely protected by a taller fence and/or a leash requirement for pets in these areas. Efforts should be made to locate (or create) other potentially suitable den habitats in more remote portions of the greenbelts and reserves.

Northern harrier - This species will benefit in the long term from the creation of new wetlands and grassland habitats. Until such is the case, care should be taken (similar to the Swainson's hawk) to maintain an appropriate mix of crops and open pasture in the study area. Prime foraging areas that might be present in the study area should be identified and avoided by major

construction during peak use periods.

Giant garter snake - All direct disturbance to the existing aquatic habitats along Willow and Dry sloughs should be avoided. Care should be taken to prevent spillage into the sloughs of soil, chemicals, asphalt, gravel, fertilizers, etc. that might be used along the paths. The possibility of enhancing and/or expanding the existing habitat along Willow and Dry sloughs should be explored. New habitat areas should be incorporated into the more natural reserves. These should include a mosaic of shallow open water, emergent marsh (cattails, bulrushes), aquatic beds (Jussiaea, Myriophyllum, Polygonum), muddy banks, seasonal pools, and adjacent grassland and scrub (wild rose, blackberry, wild grape). A complex, convoluted network of ditches and channels with gradual banks would provide excellent edge habitat.

Valley elderberry longhorn beetle - Existing elderberry plants in the open space areas should be retained and avoided by direct disturbance. Additional elderberry plantings should be made in the greenbelts and the habitat reserves.

Finally, timing of all major construction work should be coordinated with local bird experts' recommendations as to when such activities should be curtailed with respect to specific animals and use areas.

Habitats and Communities. In addition to simply retaining the small amounts of riparian vegetation and undeveloped grassland that remain in the area, the following actions would help enhance the natural ecological diversity and integrity of the area:

Existing natural habitats along the Putah Creek overflow channel, Willow and Dry sloughs, and in the Sykes Slough area should be retained in the open space design and expanded to the largest width feasible (within which minimal ground disturbance would be allowed). These areas should receive enhancement plantings of native plants and should be managed for natural community dynamics.

Extensive native plantings (riparian, oak savanna, grassland) should be incorporated into the greenbelt design, especially in the Yolo Basin Wildlife Area. A full variety of communities should be incorporated, from sacaton grassland and marsh, to vernal pools, oak and riparian forest, and alkali scrub. Detailed planting designs should be prepared prior to each component's implementation.

Vernal pool creation should be implemented at the Sykes Slough reserve, in the Yolo Basin Wildlife Area, as well as on any saline soils within open space designations. Specific efforts to re-establish vernal pool habitats should focus on selecting potentially suitable sites and actually creating small shallow depressions. Monitoring of the pools' success and problems (e.g., weed encroachment) should be included in any such efforts.

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Appendix A

Plant species recommended for open space
revegetation and landscaping

Valley floor (upland)

TREES

valley oak*

Quercus lobata

coast live oak*

Quercus agrifolia

digger pine

Pinus sabiniana

blue oak

Quercus douglasii

cottonwood

Populus fremontii

SHRUBS and SMALL TREES

redbud*

Cercis occidentalis

buckeye*

Aesculus californicus

wild rose*

Rosa californica

coyote brush

Baccharis pilularis ssp. *consanguinea*

saltbush*

Atriplex (saline)

mulefat*

Baccharis viminea (seasonally wet)

GRASSES and HERBS

needlegrasses*

Stipa pulchra, *cernua*

creeping wildrye

Elymus triticoides

saltgrass*

Distichlis spicata

wild barley

Hordeum depressum, *brachyantherum*

onion grasses

Melica californica, *imperfecta*

blugrasses

Poa scabrella, *annua*

mugwort

Artemisia douglasiana

plus a number of clarkias, owl's clover, brodiaeas, goldfields, poppies, tidy tips, lupines, and other wildflowers

Valley floor (lowland, riparian)

TREES

valley oak

cottonwood

tree willow*

Salix goodingia variabilis

black walnut*

Juglans hindsiana

box-elder

Acer negundo

Oregon ash*

Fraxinus latifolia

sycamore*

Platanus racemosa

SHRUBS and SMALL TREES

willows

Salix hinsiana, *laevigata*, *lasiolepis*

button-willow

Cephalanthus occidentalis

blackberry

Rubus

wild grape

Vitis californica

GRASSES and HERBS

cattails, bulrushes, rushes and sedges, giant reed, hibiscus

* denotes species most suitable for greenbelts and greenways

APPENDIX F
CULTURAL ASSESSMENT



holman & ASSOCIATES
Archaeological Consultants
"SINCE THE BEGINNING"

3615 FOLSOM ST. SAN FRANCISCO,
CALIFORNIA 94110 415/550-7286

Jaime Maldonado
Project Manager
STA Inc.
150 Post Street Suite 630
San Francisco, CA 94108

March 22, 1990

Dear Mr. Maldonado,

RE: ARCHAEOLOGICAL LITERATURE REVIEW UPDATE FOR THE CITY OF DAVIS
REVISED OPEN SPACE ELEMENT PROJECT

I finally received the results of the literature review done by the California Archaeological Inventory located at Sonoma State University for the area referenced above. I have included two maps, the Davis and Merrit Quadrangles which cover the planning area; they have the areas marked which have been inspected for cultural resources, and those areas of "possible" or actual recorded prehistoric sites. The historic inventory of the area has not been included at this time.

I count a total of 15 areas which have been surveyed for cultural resources, only three of these which are of any size (S-2954--3 areas, and S-8652,5097). In total, these surveyed areas probably add up to less than one percent of the total ground area of the planning area as marked. None of these surveys have been done recently; most of them date from the early 1980's.

In summary, little has changed since the City of Davis asked for a cultural resources review in 1987. In a letter by Christian Gerike of the center dated February 27, 1987, Mr. Gerike reported that there were a total of 10 historic sites listed with either the National Register or the State Historic Inventory, 149 sites listed with the City of Davis Cultural Resources Inventory, and a total of 8 reported prehistoric sites. It was the conclusion of Mr. Gerike that the area contained additional historic and prehistoric resources, and that project specific review process be set up to determine just when and where additional cultural resources work should be done.

Given the fact that the present area of study is larger, there would appear to be even more of a chance that future activities inside

the planning area could impact either historic or prehistoric resources. I would agree with Mr. Gerike that there is a pressing need to devise a project review process to insure that any unrecorded or recorded historic or prehistoric resources are identified early in the planning process and that appropriate planning and/or mitigation measures are implemented to assure their preservation whenever possible.

Lastly, the enclosed maps are meant for your review only, and should not be included in any document which will be released to the general public. Disclosure of the locations of known or suspected prehistoric sites could cause them to be vandalized. Additionally, the placement of known or suspected archaeological sites at this time cannot be used to guess at the potential presence or absence of additional cultural resources. Such a prediction should be made utilizing not only the recorded record of locations, but additional information about potential site locations in the possession of the Archaeological Inventory, the State Historic Preservation Office and professional archaeologists and historians acquainted with the Davis local.

Sincerely,



Miley Paul Holman
Holman & Associates

California
Archaeological
Inventory

ALAMEDA
COLUSA
CONTRA COSTA
DEL NORTE
HUMBOLDT
LAKE

MARIN
MENDOCINO
MONTEREY
NAPA
SAN BENITO
SAN FRANCISCO

SAN MATEO
SANTA CLARA
SANTA CRUZ
SOLANO
SONOMA
YOLO

Northwest Information Center
Department of Anthropology
Sonoma State University
Rohnert Park, California 94928
(707) 664-2494

27 February 1987

File No.: 87-45

Wayne Heiser
Blayney-Dyett
Urban and Regional Planners
70 Zoe Street
San Francisco, CA 94107

Re: General Plan for City of Davis Planning Area, Yolo/Solano Counties,
California.

Dear Mr. Heiser;

The Northwest Information Center's files were reviewed per your request of 6 February 1987. The City of Davis Planning Area contains 3 historic sites listed in the National Register of Historic Places and 7 historic sites listed with the California Inventory of Historic Resources. One additional site, listed in the California Inventory of Historic Resources, may be within the Planning Area, however, adequate locational information is not provided to locate the site. There are 149 sites (one of which, College Park, contains 44 structures) listed in the City of Davis's Cultural Resources Inventory (Historic Environment Consultants 1980). There are 4 recorded prehistoric sites, 8 reported prehistoric sites, and no recorded historic archaeological sites listed with the California Archaeological Inventory. Less than 10% of the total area of the City has been archaeologically surveyed.

There is a high probability of resources being located in the Planning Area beyond those recorded and inventoried. Two historic maps, of Yolo and Solano Counties (De Pue 1879, Thompson and West 1978), depict Davisville (Davis) and structures in the area surrounding Davis. Such cultural resources, as sites of historical events, all sites of architectural value, and areas of Native American concern were not included in this review and may also be in the study area. Archival and field study is strongly anticipated to result in the identification and recording of additional cultural resources in areas not yet studied.

It is recommended that a project specific review process be established to determine possible adverse effects on known cultural resources and to determine the possibility of adverse effects on as yet unrecorded cultural resources. Project specific planning should be conducted by a cultural resources specialist, or a similarly qualified person, to determine the possibility of cultural resources and the potential for adverse impact by a project. Project reviews should taken into account the latest additions to this data. This office can be contracted to provide such services.

Please sign and return the enclosed form. If you have any questions, give this office of the California Archaeological Inventory a call.

Sincerely,

Christian Gerike
Assistant Coordinator



Leigh Jordan
Curator II

RECEIVED
JAN 24 1990
CITY OF DAVIS
PLANNING

LITERATURE REVIEWED

In addition to archaeological maps and site records on file at the Northwest Information Center, Sonoma State University, the following literature was reviewed:

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VIII. RESPONSE TO COMMENTS

PROPOSED
REVISED OPEN SPACE ELEMENT
RESPONSE TO COMMENTS

STATE CLEARINGHOUSE NUMBER:
90030133

PREPARED FOR:
CITY OF DAVIS
COMMUNITY DEVELOPMENT DEPARTMENT
23 RUSSEL BOULEVARD
DAVIS, CALIFORNIA 95616
CONTACT: BILL ALLAYAUD

PREPARED BY:
STA PLANNING, INC.
250 MONTGOMERY STREET, SUITE 1000
SAN FRANCISCO, CALIFORNIA 94104

JUNE 27, 1990

INTRODUCTION

The purpose of the Response to Comments is to transmit all comments received related to the Draft Environmental Impact Report (EIR) prepared for the Davis Open Space Element. These comments include those mailed to the Community Development Department, those made at the Planning Commission meetings of May 15 and May 29, 1990 and the Natural Resource Commission and Parks and Recreation Commission meeting of May 23, 1990.

PUBLIC REVIEW PERIOD

The Draft Environmental Impact Report for the Davis Open Space Element was distributed to various public agencies, responsible agencies, citizen groups, and interested individuals. The report was made available for public review and comment for a period of 45 days. The public review period for the Draft EIR established by the State Clearinghouse commenced on April 26, 1990 and expired on June 11, 1990.

The EIR was mailed directly to all Responsible and Trustee agencies. Many copies were mailed directly and made available at the Community Development Department. Copies of the Environmental Impact Report were located at the Community Development Department, the UC Davis Library (Government Documents Branch), and the Yolo County Library located at 314 East 14th Street, Davis, California.

PUBLIC COMMENT

The City of Davis utilized several methods to solicit input on the Draft EIR and the Davis Open Space Element. These methods included the preparation of distribution of a Notice of Preparation, a Scoping Meeting during the Notice of Preparation review period, distribution of a Draft EIR, preparation and distribution of the Notice of Completion, and scheduling of several public hearings as described above.

NOTICE OF COMPLETION

A Notice of Completion was filed on April 26, 1990. This notice was filed with the State Office of Planning and Research.

ORGANIZATION AND FORMAT OF THE RESPONSE TO COMMENTS

Written comments are contained in Appendix A. Comments have been numbered and responses have been correspondingly numbered. According to CEQA, responses must describe "the disposition of significant environmental issues raised." (CEQA Guidelines

Section 15088(b)). Although not required, responses to comments which relate to design or planning issues have been responded to.

Verbal comments stated at several public hearings are then presented in the following order: Planning Commission hearings and the Natural Resource Commission and Parks and Recreation Commission joint hearing. Responses to these comments follow.

WRITTEN COMMENTS INDEX

STATUS	AGENCY	DATE	ACRONYM
Public	Downey, Brand, Semour, and Rohwer Kathryn Tobias	June 11, 1990	KT
	Hamel Ranch Partnership John Hamel, Clyde Rust, Mary Rust	June 11, 1990	HR
	Charles Lillard	June 11, 1990	CL
	Streng Brothers Homes, Inc. Bill Streng	June 11, 1990	BS
	West Davis Associates Lynn Yackzan, Bob Schneider	June 11, 1990	WDA
	Randolph Yackzan	June 11, 1990	RY
	Steven E. Greco	June 10, 1990	SG
	Diocese of Northern California John L. Thompson	June 8, 1990	JT
	Daniel K. Dowling	June 6, 1990	DD
	Wells Fargo Bank David J. Brown	June 5, 1990	DB
	Hefner, Stark, and Marois Marshall K. Jaguish	May 31, 1990	MJ
	Putah Creek Council Steve Chainey	May 29, 1990	SC
	Davis Audubon Society Ed Whisler, Brian Lenz	May 24, 1990	DAS
	John Whitcombe	May 23, 1990	JW

WRITTEN COMMENTS INDEX (Cont.)

STATUS	AGENCY	DATE	ACRONYM
	Heidrick Farms, Inc. Robert Eoff	May 18, 1990	HF
	Dennis Wescott	May 17, 1990	DW
	University of California Davis Mark Francis	May 15, 1990	MF
	City of Woodland Community Development Department Janet Ruggiero	May 10, 1990	CW
County	County of Yolo Donna Landeros	June 7, 1990	DL
State	Office of Planning and Research David C. Nunenkamp	June 11, 1990	OPR
	Department of Fish and Game Pete Bontadelli	June 7, 1990	CDFG
	California Regional Water Quality Control Board Richard McHenry	May 18, 1990	RM

RESPONSE TO WRITTEN COMMENTS

KATHRYN TOBIAS (KT)

KT-1A

In accordance with CEQA Guidelines Section 15126, a reasonable range of alternatives has been described on pages 119 to 125 in the EIR. According to Section 15126 (d), "the range of alternatives required in an alternative is governed by 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.... An EIR need not consider an alternative whose implementation is remote and speculative."

Currently, the alternatives section analyzes two No Project Alternatives, including Buildout Under The Existing General Plan. This alternative addresses "urbanization" according to the Davis General Plan and according to Yolo and Solano County Zoning.

Unless land, development rights, or easements are dedicated to or purchased by the City of Davis, County Zoning will remain in effect. Clustered development or 1, 5, or 10-acre ranchettes would not be permitted under County Zoning which allows for one dwelling unit per 20 acres. The implementation of clustered development regulations and 10-acre ranchette regulations goes against County policies to preserve agriculture, and is therefore remote and speculative. The Open Space Element's intent is to provide additional open space uses and not to extend development rights to property owners beyond those which are currently allowed by the County.

In fact, the Greenbelt, Agricultural Preserve, and Nature Reserve/Wildlife/Wetlands designations would reduce housing development potential below that of County Zoning. Until the County of Yolo implements these designations or the City purchases development rights or annexes the property, the Open Space Element is only the City's plan for the area. At present, the City has not indicated it has any plans for allowing urbanization, through General Plan amendments and annexation, in the areas outside of the Davis Greenbelt. Therefore, this alternative was not considered to be reasonable and was not examined.

KT-1B

The Design Alternative incorporates an alternative location for the Davis Greenbelt.

KT-1C

Please refer to KT-1A above and to PD-1 in the NOP responses, and to Errata LU-1. The reference to a satellite community in Mitigation Measure 3 has been deleted in accordance

with Planning Commission Comments. The purpose of the Responses to NOP Comments is not to provide complete responses or to identify the exact location of their concerns. The purpose of the responses is to focus on those comments that have bearing to the environmental document. Those comments related to other issues are forwarded to the appropriate decisionmakers. Since a satellite community is part of Policy 2.1.C. in the 1987 Davis General Plan, please refer to the General Plan EIR for any further environmental discussion.

KT-2A

The project description indicates that the project consists of the adoption of the Open Space Element and related General Plan and Specific Plan amendments.

No application for pre-zoning has been filed by the City of Davis. Please see ECK-2 in the NOP Response section of Appendix A to the DEIR.

Required Discretionary Actions are discussed on page 13 of the Draft EIR. The City of Davis General Plan should not be confused with a zoning ordinance map. A zoning ordinance map is a parcel-specific statement of how lands may be used in the present and the near future. As a legal instrument, the zoning map has immediate force and effect. In contrast, the General Plan is a generalized, long-term statement of land use. The function of a General Plan is to provide a policy framework that must be reflected in the zoning ordinance and specific plans, which are the primary mechanisms for implementing these policies. Since it is a long-term statement of land use policy, it is possible that the ultimate use of a particular land area, as shown in the plan, may differ from the existing use currently permitted by the zoning ordinance map. As prescribed by phasing mechanisms contained in the plan, the zoning ordinance must be revised at the appropriate times to reflect the long-range land use policies in the plan.

Given this relationship between the General Plan and zoning, the zoning ordinance map will not and should not be a mirror-image of the land use plan map. This type of one-on-one correspondence is not required by consistency requirements. Because the plan map is generalized, it will not show the location of small scale uses, such as those within the Davis Greenbelt. The plan should contain policies governing the location of such small scale uses, and it will be necessary to exercise judgement in interpreting these policies. In other words, the plan will not provide automatic, locationally precise answers in all cases, but may require interpretation of plan policies in certain instances.

As stated in the Initial Study, the appropriate level of analysis for a General Plan is general. An implementation plan will be prepared subsequently as well as specific plans for open space components. At that time detailed environmental analysis will be prepared. Please also refer to the discussion of tiering in the Initial Study.

Finally, the Open Space Element Map, which is to be adopted as part of this project, clearly states, as a Map Note, that the designations are schematic and exact boundaries will be determined at the time of implementation.

KT-2B

The City is not proposing urban development as part of this plan, therefore, the "windfall" benefits of urbanization of agricultural land is not at issue. Furthermore, the City is proposing to purchase private property that may be in agriculture, to the extent required by law, where the project implementation calls for it. The City's Major Projects Financing Plan (MPFP) includes a provision for purchase of the Davis Greenbelt. Under the current General Plan, and therefore the MPFP, the area to be purchased is known as the "Greenbelt/Agricultural Buffer."

The burden of providing a buffer between ongoing agriculture and any activity or use in the Davis Greenbelt is not being shifted to owners of agriculture land. Existing General Plan Policy 3.2.D. as quoted by the commentor, requires the property owner proposing development, which could be the City of Davis, to provide the buffer.

KT-2C

The City's current growth management practices include a housing allocation system. The objectives of the revised Open Space Element on page 14 of the Project Description do not include the use of the Open Space Element as a growth management tool. The effects of the revised Open Space Element on population and housing limitations are described in the EIR. Unless the City of Davis purchases development rights or easements, County zoning would prevail and allow build-out according to zone.

KT-3

While the Notice of Preparation had indicated that a fiscal analysis would be done as part of the EIR, none was provided as part of the EIR. CEQA does not require a fiscal analysis and the City determined that it did not want one completed. Nonetheless, the City prepared a limited fiscal analysis as part of the staff report to the City Council (staff report for June 20, 1990) which included a discussion of the Major Project Financing Plan and its provisions for purchase of land for the Davis Greenbelt.

As far as when this project is to be implemented, it will be done over the life of the General Plan. Property owners will be notified when a specific project is proposed for their property. This approach is no different from how the remainder of the City's General Plan is implemented.

KT-4

Please refer to KT-2A, page 6.

As indicated on page 34 and following pages of the Draft EIR, the compatibility of adjacent uses is considered. This includes the effects of rodent populations, increased human activity, and aerial spraying generally on farming operations. General mitigation measures are identified in the EIR that lessen impacts on adjacent agriculture, such as the establishment of buffer areas and spray easements. Mitigation Measure 2 states that "[t]he City shall ensure that trespassing into agricultural areas is minimized through signage, access restrictions, and fines."

KT-5

As indicated on page ii of the Table of Contents, several items are part of the Executive Summary including:

- Introduction
- Project Environmental Summary
- Alternatives
- Areas of Controversy
- General Summary of Impacts and Mitigation Measures
- Alternative Summary Matrix

This section fulfills CEQA Section 15123 which does not prescribe a format but which lists areas to be addressed.

The General Summary of Impacts and Mitigation Measures describes the number of the proposed mitigation measures. The Alternative Summary Matrix identifies whether the impacts of the alternatives are less, equal to, or greater than that of the proposed project. The alternatives discussion in the EIR provides greater detail of how or why the alternatives reduce or avoid significant effects.

KT-6

Please refer to KT-5. Land use compatibility issues include the compatibility of open space uses next to agriculture as discussed further in the DEIR on page 33.

Housing impacts including the loss of potential housing are discussed on pages 88-99. As the Implementation Plan and future specific open space components are proposed, further environmental analysis will be prepared.

KT-7

In reference to Section 15126 of CEQA, the basic requirement is to "...make substantial reductions in the adverse effects of the project where it is feasible to do so." No feasible mitigation measures were identified in the environmental review process that would be appropriate for the City of Davis.

KT-8

As stated in Comment KT-2A above, the project is not site specific at this time. Nevertheless, the general impacts on services are discussed and general mitigation measures are identified. As part of normal City procedures, all proposed project plans are reviewed by appropriate City departments for standard safety concerns.

The City has also added a new policy to the Open Space Element since the Draft EIR was prepared which mirrors the mitigation measures identified for this impact. See Open Space Element Policy 3.4.B.

KT-9

Please refer to KT-3, page 7.

The commentor's assertion that the EIR must be recirculated does not meet the test of CEQA Guideline Section 21092.1. This section only requires recirculation of the EIR if significant new information is added. No new significant information has been added to the EIR.

KT-10

The quote in Comment KT-10 omits the next sentence of the discussion of CEQA Section 15152 which states:

"This section recognizes that the approval of many projects will move through a series of separate public agency decisions, going from approval of a general plan, to approval of an intermediate plan or zoning, and finally to approval of a specific development proposal. Each of these approvals is subject to the CEQA process.... Tiering is an effort to focus environmental review on the environmental issues which are relevant to the approval being considered."

The Open Space Element is part of a general plan document. An implementation plan would be an "intermediate" plan. Specific open space plans would constitute "specific development" proposals. As stated on page 2 of the DEIR, more specific environmental

analysis will be prepared as specific plans are proposed. The actions covered by the DEIR are stated on page 13 of the Project Description.

Furthermore, the project does identify the uses allowed in the various land use designations. For example, the Davis Greenbelt designation clearly states the purpose of the designation, the allowed uses, which include agriculture of various kinds and recreation. Exactly where the uses are to occur is not known at this time. This is analogous to the General Plan where a large parcel may have a land use designation of "Residential-Single Family"; until detailed plans are developed by the property owner, the City will not be able to pinpoint where public services will go or exactly what the mix of housing types or densities will be.

KT-11

Please refer to KT-10.

Concerning the 23-year planning period contained in the designation of "Agricultural Open Space," this policy merely repeats existing General Plan language. The land use designation "agriculture," which is partially replaced by the "Agricultural Open Space" designation, specifically states "during and beyond the 23-year planning period."

KT-12

Please refer to page 9 of the Project Description which states that financing is available through three means:

- Major Projects Financing Plan
- Quimby Act
- Proposition 70 monies (see the Prop 70 Task Force Reports)

KT-13

Please refer to KT-2A, page 6.

KT-14

The comment is noted.

KT-15

The South Davis Specific Plan map is included as an attachment to the May 15, 1990 Planning Commission Staff Report which will be included in the Final EIR.

KT-16

Please refer to KT-2A, page 6 and KT-10, page 9.

KT-17

A map of parks and recreation facilities is included in Appendix A along with the Public Service and Utility questionnaires.

KT-18

Please refer to the individual environmental documents prepared for the pending development projects. It is beyond the scope of this Draft EIR to analyze the environmental impacts of unrelated projects. The pending development projects have been considered in the cumulative impacts analysis which is general in accordance with the appropriate level of analysis. The General Plan EIR contains information on the buildout of projects during the General Plan time-frame.

KT-19

This information was provided by the City of Davis. To our knowledge, this is the latest available information.

KT-20

On page 28, the crops grown adjacent to the City of Davis are indicated in the text. Table C on the opposite page states clearly that the crops listed below are produced in Areas A and B of the Yolo Basin Wildlife Plan area.

Furthermore, the project's general impacts on agriculture have been identified and mitigation measures identified (e.g. buffers and spray easements). Also, the City has as part of its current General Plan a "Greenbelt/Agriculture Buffer" that is approximately where the Davis Greenbelt is to be located. The General Plan EIR addressed the buildout of the City to this buffer area and identified the impacts on agriculture and appropriate mitigation measures. The commentor assumes that urban development adjacent to agricultural uses has never been considered before by the City, when in fact that is the current situation.

KT-21

[Will be provided.]

KT-22

"Ag Hoc" is the name of the committee. It is not a typographical error.

KT-23

Exhibit 8 was inadvertently omitted. It is located in Errata LU-2, page 72.

KT-24

Exhibit 8 shows the location of various soil types. Please refer to KT-23.

KT-25

The comment is noted and forwarded to the appropriate decisionmakers. Please refer to the March 15, 1990 letter from the Department of Conservation in Appendix A.

KT-26

Please refer to KT-23.

KT-27

Please refer to KT-1A, page 5, and KT-20, page 11.

Expanding on the response in KT-20, it is a fact that most jurisdictions that have prime agricultural land within their planning area are establishing or have established urban/rural boundaries or buffer areas of some kind between urban development and agricultural land. The City did this as part of their General Plan adopted in 1987 and the EIR for the General Plan addressed the associated impacts. This is not a new "impact" caused by this project. The Open Sauce Element policies do not establish any new urban boundaries, growth rates or limits, or housing allocation schemes and as such are not "growth management tools." This project is a refinement and expansion of the current General Plan policies to protect open space and provide recreational opportunities for the citizens.

It is not clear at this point whether the commentor is arguing for the ability of the landowner to preserve the land for agriculture (see for example KT-20 and KT-30) or the ability of the land owner to convert the land to urban uses (see for examples KT-1A, KT-

2B, and KT-35). The EIR address the impacts of this project, which assumes the continued use of the area beyond the Davis Greenbelt to be agriculture.

The Regional and Local Setting defines the areas considered in the project-specific and cumulative analysis. Please refer to KT-2C, page 7.

KT-28

Please refer to KT-10, page 9.

KT-29

Given that the amount of acreage converted in Area B of the YBWA has not been calculated by the Department of Fish and Game, a total number was not provided (please see page 41 of the DEIR). Without Area B, the total acres converted equal 1,483.

KT-30

Please refer to KT-2A, page 6, KT-4, page 8 and KT-10, page 9.

The issue of liability is not an environmental impact and therefore was not addressed in the EIR.

KT-31

This determination was made by City Staff at the Planning Department based on the intent of the revised Open Space Element policies and on the intent of the open space category definition. Please refer to KT-10, page 9.

KT-32

Please refer to KT-31.

KT-33

Please refer to KT-10, page 9. As stated on page 41, "the minimum distance between residential land uses and agricultural operations that apply Class I pesticides is 500 feet." This distance has been selected by the Yolo County Agricultural Commissioner. Please also refer to KT-2B, page 7.

KT-34

Please refer to KT-1A, page 5 and KT-2A, page 6.

The amount of land designated for agricultural preserve is shown on Table A of the Project Description.

KT-35

Please refer to KT-2A, page 6 and KT-27, page 12.

KT-36A

A Mitigation Monitoring Program will be prepared as a part of the Final EIR. By preparing it at that time, all changes to the mitigation measures and to the project can be incorporated.

The purpose of Mitigation Measure 1 is to ensure that future open space components have adequate environmental documentation for the specific issues listed. It gives an example of how an issue could be studied. It will become part of the Mitigation Monitoring Program.

KT-36B

Please refer to KT-36A.

KT-36C

Please refer to KT-10, page 9 and KT-36A.

KT-37

Please refer to KT-39.

KT-38

Please refer to KT-1A and 1C, page 5, KT-23, 24, 25, and KT-27, page 12.

The City staff report has indicated that the Greenbelt is intended to be a stable urban/rural boundary. Please refer to page 5, Planning Commission Staff Report, May 23, 1990.

KT-39

Project impacts related to pesticide use are addressed in KT-2B, page 7 and KT-4, page 6.

If the City implements Mitigation Measure 2 in accordance with the Mitigation Monitoring Program, trespassing impacts will be mitigated to a level of insignificance. The disincentives to trespass in the mitigation measure will help defer any trespassing.

The EIR states that the cumulative impact of conversion of prime agricultural land cannot be mitigated to a level of insignificance.

KT-40

Please refer to KT-2C, page 7. Page 99 discusses cumulative housing impacts.

The City of Davis has a growth management plan in place that is based on a housing allocation system. Properties outside of the City of Davis are ultimately subject to county zoning.

The project objectives are as stated on page 14 of the Draft EIR. No objectives related to growth management are stated.

KT-41

The document, the County of Yolo General Plan, does not state its horizon year.

Please refer to Errata LUP-1.

KT-42

The County of Solano General Plan is currently being revised. Background work for the housing element has begun. All other elements are not under preparation. The General Plan will be updated by 1995 with a 15 year horizon. (Robert MacNicholl, June 15, 1990)

The City of Vacaville is outside of the regional area set forth for this project during the NOP/scoping process. The County of Solano and Yolo and the Cities of Fairfield, Dixon, Winters, and West Sacramento were formally contacted during the preparation of this document. Information provided relating to similar projects in the regional area of the proposed project are provided in the Regional and Local Setting, Land Use, and Land Use Plans sections of this report.

KT-43

See Errata LUP-3.

KT-44

After contacting the Solano County Planning Department this information was not available.

KT-45

Please refer to KT-33, page 13.

KT-46

Approval of this project will mitigate project-specific impacts General Plan inconsistencies and specific plan map inconsistencies.

KT-47

The City of Vacaville is outside of the regional area set forth for this project during the NOP/scoping process. The Counties of Solano and Yolo and the Cities of Fairfield, Dixon, Winters, and West Sacramento were formally contacted during the preparation of this document. Information provided relating to similar projects in the regional area of the proposed project are provided in the Regional and Local Setting, Land Use, and Land Use Plans sections of this report.

KT-48

Please refer to KT-4, page 8, KT-39, page 13, and KT-47.

KT-49

The City is not proposing land use changes such as residential or industrial within the City limits that would affect the jobs/housing balance. Nor will the approval of this project have any significant effect on the jobs/housing balance. The City has addressed its housing needs and the generation of jobs when it updated its General Plan in 1987. That General Plan was accompanied by the appropriate EIR; further discussion of this issue is beyond the scope of this EIR.

KT-50

County policies discourage development on agricultural lands. County policy LU2 discourages the development of housing or urban uses in agricultural areas as stated in Appendix B of the Draft EIR.

KT-51

Yolo County discourages urban development on agricultural lands. The analysis presented in the Draft EIR is a worst case analysis. It is considered speculative to predict to which City the population would go.

KT-52

Please refer to KT-49, KT-50, page 16, and KT-51, above.

KT-53

This discussion refers to the existing conditions which are not caused by the proposed Open Space Element. For further discussion of affordability please refer to the Housing Element. Please refer to KT-49, page 16.

KT-54

On page 99 of the EIR, the cumulative impacts section states that "[i]n combination with other past, present, and reasonable foreseeable projects that restrict growth in the region, planned housing growth may be limited." It may be limited if the City successfully implements its designations in unincorporated areas. Otherwise County regulations would apply, since the County currently has jurisdiction over the land.

The proposed Open Space Element will affect potential housing over the General Plan Planning Period (i.e., through the year 2010) in the planning area. Potential housing impacts are stated on pages 88 to 99 in the Draft EIR. Fair share housing allocation by SACOG are prepared approximately every five years. The last adopted fair share allocation was prepared in 1984 and covered the period January 1983 to July 1990.

Currently, draft fair share allocation figures have been calculated for the period 1990 through 1996. These figures may be modified by jurisdictions who dispute their allocation. The jurisdictions must submit data in support of the allocation change. The regional fair share allocation will be adopted in final form by September 1990. ABAG's housing needs determinations were published in 1989. The draft allocations for the period are presented below for the cities and counties in the regional area.

JURISDICTION	TOTAL BASIC CONSTRUCTION NEED	
	1990-1996	1988-1995
SACOG:		
Davis	3,412	
West Sacramento	1,408	
Winters	521	
Woodland	3,396	
Yolo County Unincorporated	892	
ABAG:		
Dixon		699
Fairfield		6,894
Source:	SACOG June 1990 ABAG January 1989	

It could be argued that the revised Open Space Element may impede the attainment of Yolo County's fair share of housing and shift the burden of providing housing to other cities and counties including Winters, Woodland, West Sacramento, Dixon, and other jurisdictions. However, it is speculative to predict when and where housing would be affected due to the following conditions:

1. The phasing schedule of proposed Open Space Components has not been defined. Fair share housing allocations may be affected for the 1990-1996 period and/or in future allocation periods. Therefore, it is not possible to state whether the County of Yolo will be unable to meet its fair share during 1990-1996 or in other allocation periods.
2. The potential housing in the Planning Area may not be affected if Yolo County retains jurisdiction over lands in the Planning Area, and the County

continues to implement its policies towards the preservation of agriculture as seen in Policy LU2 as follows:

LU 2. Land Use, Basic

Yolo County shall direct the distribution, location, and density of land uses throughout the unincorporated area by means of a Land Use Element of this General Plan, coordinated with all of the other integrated or referenced elements within Community Plans, Area Plans, and subject plans which are a part of this General Plan as amended.

This Land Use element requires that new development be located according to these priorities:

- First: Renew and maintain existing urban areas.
- Second: Develop vacant land within urban areas, presently served by streets, water, sewer, and other public services.
- Third: Where necessary to develop outside existing developed urban areas, only develop land immediately adjacent to the existing urban developments.
- Fourth: Prohibit urban development in agricultural areas.

Additionally, Yolo County General Plan policies LU7, LU14, LU16, LU17, LU20, and LU21 specifically prohibit residential land uses and subdivisions for residential purposes on land designated as agriculture. These policies are included in the Draft EIR in Appendix B.

3. If some Williamson Act Contracts remain in effect prior to the end of the General Plan Planning period, then less potential housing would be lost. Land under Williamson At Contracts is restricted in the number of residences that may be allowed. The calculations below assume that Williamson Act Contracts will not expire prior to General Plan build-out. Since no significant impacts were identified in the EIR for Solano County, this analysis is limited to Yolo County.

Using the estimates in the Table below, the loss of potential dwelling units has been reduced from 853 to 247. The loss of potential dwelling units remains a significant impact.

The analysis in the EIR is "worst-case." It is possible, given County zoning, that 853 units would be precluded from development in Yolo County. The EIR states this is a project-specific impact and that the loss of housing will contribute cumulatively to a loss of potential housing units in the region. The analysis presented in the above paragraphs does not change the overall conclusion in the housing section of the EIR. The loss of potential housing is a significant impact.

PROPOSED OPEN SPACE USE	TOTAL ESTIMATED ACREAGE	APPROXIMATE ACREAGE UNDER WILLIAMSON CONTRACTS	POTENTIAL DWELLING UNITS UNDER ZONING
Yolo Basin Wildlife Refuge	6,406	5,839	29
Davis Greenbelt	2,730	581	108
Willow and Dry Slough	476	256	11
Agricultural Preserve	7,443	5,436	100
TOTAL			247

Source: STA Planning, Inc.

KT-55

Comment noted and forwarded to the appropriate decisionmakers.

KT-56

Please refer to KT-50, page 16, and KT-51, page 17.

KT-57

Please refer to KT-1A, page 5.

KT-58

Please refer to KT-54, page 17.

KT-59

Please refer to KT-2A, page 6.

KT-60

See Response KT-2A, page 6 and KT-10, page 9.

KT-61

Please refer to KT-8, page 9.

KT-62

Please refer to KT-8, page 9.

KT-63

This is one of two No Project Alternatives. To accurately assess the No Development Alternative one would have to read the referenced environmental sections. These pages are as follows: Land Use pages 25-33, Land Use Plans pages 47-71, Population, pages 83-85, Housing, pages 88-96, Biological Resources, pages 100-106, Cultural Resources, page 111, and Public Services and Utilities, pages 114-115 in the Draft EIR. There are approximately 168 paragraphs, 10 tables, and 8 exhibits of analysis that relate directly to the No Development Alternative. After reviewing this analysis a determination was made that since the No Development Alternative would not have the environmental benefits of the proposed project, it does not meet the objectives of the proposed project, or even the goals of the existing general plan.

If the proposed project does not attain approval, the Development Under the Existing General Plan would take precedence. The second of the No Project Alternatives, Development Under Existing General Plan, is analyzed in detail in the Draft EIR.

KT-64

Please refer to KT-4, page 8, KT-27, page 12, and KT-39, page 14.

KT-65

Please refer to KT-54, page 17.

KT-66

Please refer to KT-1B.

KT-67

Please refer to KT-1A, page 5, which defines the project.

This project is an amendment to the Open Space Element. While this will have implications for future land uses, alternative development scenarios other than those that can be implemented under project zoning are considered speculative at this time. The appropriate time during the environmental review process to scope alternatives is during the NOP 30-day review period. Additionally, the City went beyond CEQA requirements and held a scoping meeting to solicit further comments.

It would not be appropriate for the City to consider development schemes such as the ones proposed by the commentor because it would be beyond the scope and intent of this project. Reasonable alternatives to consider are those that are capable of eliminating any adverse significant environmental effects. The alternatives suggested by the commentor do not further this purpose.

KT-68

Please refer to KT-2A, page 6 and KT-10, page 9.

KT-69

Please refer to KT-2A, page 6.

KT-70

Please refer to KT-48, page 16, KT-52, page 17, and KT-62, page 21.

KT-71

The main assertion of this EIR is that further environmental analysis must be completed prior to implementation of any portion of the Open Space Element. The purpose of this section is ensure that issues that are "tiered" by virtue of the Initial Study are easily accessible to the planning staff for incorporation into further environmental review.

KT-72

Mitigation Measures 1 and 2 mitigate pesticide and trespassing impacts to a level of insignificance. Please refer to KT-4, page 7 and KT-39, page 13. Please also refer to KT-8 on page 9.

KT-73

Please refer to KT-72, above, and KT-54, page 17.

KT-74

Please refer to KT-8, page 9.

KT-75

Please refer to KT-1A, page 5.

The Urbanization Alternative assumes that the City of Davis Zoning, the County Yolo Zoning, and the County of Solano Zoning are implemented. During the project staff and consultant agreed to incorporate zoning into the Development Under Existing General Plan Alternative. The aforementioned conditions are assumed in the analysis for Development Under Existing General Plan as stated on pages 120 and 122 of the Draft EIR.

KT-76

The purpose of the responses to comments is to focus on those comments that have a bearing on the environmental document.

KT-76a

DOC-4 refers to Williamson Act Contract lands. It is clear that you intend for us to respond to DOC-5 which refers to farmland conversion impacts.

Crops grown in the County areas adjacent to the City of Davis include truck crops, wheat, tomatoes, sugar beets, un-irrigated pasture, alfalfa, oat hay, turf, safflower, cut flowers, and UC Davis' agricultural plantings. (Open Space Element EIR, City of Davis, April 26, 1990).

Please refer to KT-29, page 13.

A comparison of Exhibits 3 and 8 shows the general location of where agriculture would be converted.

KT-76b

Please refer to the discussion of "tiering" in the Initial Study in Appendix A - Public Participation and Review and to the Draft EIR Introduction. Please also refer to KT-10, page 9.

KT-76c

The commentor is assuming that overall agricultural productivity will be reduced and therefore revenues from agricultural will be reduced. The project will not reduce agricultural productivity except where the City specifically buys land for a Connector Greenway, Davis Greenbelt, or habitat and converts it. This loss is considered a fiscal impact and is not addressed in this EIR.

KT-76d

The designating of this area as habitat merely means that it is potential habitat. If and when the project is implemented, the issues of water quality and insect populations will be addressed, along with all other potential environmental effects.

Please refer to the discussion of "tiering" in the Initial Study in Appendix A - Public Participation and Review and to the Draft EIR Introduction. Please also refer to KT-10, page 9.

Please refer to DW-1, page 40.

Within City government, the decisionmakers are the Planning Commission and the City Council. In this case, the Planning Commission made a recommendation to the City Council on May 29, 1990 to approve of the discretionary actions. These decision-makers will approve projects only after appropriate environmental analysis and documentation consistent with CEQA. Deferring decisions at this point is not a shunning of the City's responsibility under CEQA, but simply necessary where the project is not yet fully detailed.

KT-76e

Please refer to KT-1A.

KT-76f

Please refer to KT-76, page 23.

KT-76g

Please refer to KT-1C, page 5.

KT-76h

The City does not have the legal basis to preclude development in the Planning Area. The only way to control land use outside of the incorporated area is to work with the counties involved or purchase development rights. If development were to occur on unincorporated lands, environmental documentation would be required by the County in compliance with CEQA.

Please refer to the Comment DL-6, letter from Yolo County dated June 7, 1990.

KT-76i

The Davis Greenbelt designation does not include the Sutter Davis Hospital site.

HAMEL RANCH (HR)

HR-1

Impacts due to increases of human activity near agricultural operations are discussed in the Land Use section of the EIR. Further analysis of these impacts shall be conducted during review of specific components of the Open Space Element. Please refer to KT-2A, page 6.

HR-2

The Open Space Element EIR is intended to address impacts of policy changes of the City of Davis General Plan Policies and Requirements. Page 45 of the Land Use section states that full implementation of above mitigation measures will reduce impacts related to pesticide use and trespassing to a level of insignificance. Since the scope of the EIR is to review impacts of policy changes only, site specific mitigation measures cannot be provided until such components are proposed. Please refer to KT-10, page 8.

HR-3

The comment is noted and forwarded to the appropriate decisionmakers.

CHARLES LILLARD (CL)

CL-1

The comment is noted and forwarded to the appropriate decisionmakers.

CL-2

Please refer to KT-3, page 7.

CL-3

Please refer to CL-1.

CL-4

Please refer to CL-1.

CL-5

Please refer to KT-2A, page 6, and KT-10, page 9.

CL-6

Please refer to CL-1.

CL-7

Please refer to KT-2A, page 6.

BILL STRENG (BS)

BS-1

Please refer to KT-3, page 7.

WEST DAVIS ASSOCIATES (WDA)

WDA-1

The comment is noted and the corrections included in Errata PD-4, page 69.

RANDOLPH YACKZAN (RY)

RY-1

The comments are noted. The loss of potential housing is addressed in the Housing section of the EIR. The fiscal analysis is being prepared under separate cover from the EIR and will be available for public review upon completion. At the time of preparation of the NOP, these topics were not considered as being areas of controversy.

RY-2

Please refer to KT-3, page 7.

RY-3

Please refer to the Alternatives section for a discussion of project alternatives. Further analysis of alternatives to individual Open Space elements will be addressed in site-specific environmental documentation. Please refer to KT-1A, page 5.

RY-4

Please refer to KT-1A and KT-1C, page 5.

RY-5

Please refer to KT-3, page 7.

STEVE GRECO (SG)

SG-1

A 100 foot average width was determined based on City Council direction. The public access corridor will vary in width and in type of use that occurs in various areas surrounding the City. Greenbelt areas bordering public recreational facilities provided in new development and on the north-central area of the City owned property will be much wider.

A wider minimum width for public access areas would have similar impacts as a 100 foot public access width. More prime agricultural land would be converted under a greater width design.

SG-2

Housing alternatives including the transfer of development rights and cluster or large lot zoning were considered and rejected from further consideration. Please refer to KT-1A, page 5 for further discussion of housing alternatives.

Effects on housing were identified in the Initial Study as an impact and subsequently included in the EIR. Although not directly environmental in nature, CEQA defines "environment" as including both natural and man-made conditions (Sec. 15360).

SG-3

Table E in the Land Use section of the EIR identifies the amount of prime agricultural land converted under each data unit. Conversion of prime agricultural land to recreational uses and wildlife areas will preclude the use of prime agricultural land and cannot be mitigated.

JOHN THOMPSON (JT)

JT-1

The comment is noted and forwarded to the appropriate decisionmakers.

DANIEL DOWLING (DD)

DD-1

The comment is noted.

DD-2

Please refer to KT-3, page 7.

DD-3

Please refer to KT-1A, page 5.

DAVID BROWN (DB)

DB-1

The comment is noted.

DB-2

Please refer to KT-2A and KT-10, pages 6 and 9.

DB-3

The City of Davis Police Department was contacted during preparation of the EIR to determine impacts of the proposed project. It was determined that all project-specific plans for Open Space Element components would be reviewed by the Department. Please refer to the Public Services and Utilities section. Mitigation of trespassing is also discussed in the Land Use section.

DB-4

The comment is noted. A detailed analysis of acreage lost due to the relocation of facilities will be discussed in analysis of specific Open Space components.

DB-5

Please refer to KT-3, page 7.

MARSHALL JAGUISH (MJ)

MJ-1

The comment is noted and forwarded to the appropriate decisionmakers.

MJ-2

Please refer to MJ-1, above.

STEVE CHAINEY (SC)

SC-1

The acreage presented in Table A refers to the amount of land under each designation, not what the acreages of different uses of the designations will be. Any discussion of changes in designations is forwarded to the appropriate decisionmakers.

Please refer to Table E which states the amount of prime agricultural land to be converted and page 41 which discussed areas A and B of the wildlife reserve. Comment is noted that a maximum of 20% will be converted.

SC-2

The comment is noted and forwarded to the appropriate decisionmakers.

SC-3

Please refer to SC-1.

SC-4

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

SC-5

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

SC-6

The City of West Sacramento Planning Area does extend to the west of Yolo Bypass but does not overlap the Davis Planning Area. In addition, the City of West Sacramento's Planning Area boundary extends only into areas C and D of the proposed YBWA. Please refer to Figure 1-4 of the City of West Sacramento General Plan.

SC-7

Figures for crops produced in the entire General Plan Study Area were not included in the EIR. The project scope includes only areas A and B of the proposed wildlife refuge. Please refer to page 40 of the Draft EIR.

SC-8

The comment is noted. A map indicating Williamson Act Contract Lands in Solano County is located in Exhibit 1-RC. The approximate prime farmland in the portion of the County in the Davis planning area is approximately 5,425 acres.

SC-9

The comment is noted and the Exhibit included in Errata LU-2, page 77.

SC-10

Figures for land use conversion for the period 1986-1988 will not be available until later this year. The Department of Conservation issues these figures. See Errata LU-1, page 77 for date correction.

SC-11

This issue was researched based on a letter from the Yolo County Farm Bureau dated March 21, 1990 (see Appendix A of the Draft EIR). As stated on page 34 and throughout the Land Use and Land Use Plans sections:

- The "introduction and enhancement of certain wildlife species . . ." (e.g. rodents) . . . "may be a minor detriment to adjacent agricultural crops."
- in addition, the impact "may be offset partially by increases in raptor populations such as the Swainson's hawk which feed on rodents." This information was obtained from Charles Patterson, consulting biologist for the proposed project on April 7, 1990, as referenced in the EIR on page 40.

Since the EIR analyzes impacts in general (due to the project's conceptual nature), future environmental documentation on the various open space components should address the compatibility issue specifically. Although Mitigation Measure 1 states that the City shall require further environmental documentation, the potential compatibility impact is not reduced to a level of insignificance. We do not know the results of the future studies and cannot say with certainty that the impacts are insignificant.

SC-12

Change to page 66, paragraph 2, sentence 2 is noted.

Sentence 4 specifically states, ". . . those participating includes, but is not limited to. . ."

Crops listed as beneficial to wildlife were referenced from the Yolo Basin Wildlife Area Concept Plan.

Alfalfa and sugar beets were not cited in this document as being beneficial to wildlife.

SC-13

Please refer to SC-11.

SC-14

The comment is noted. Please refer to Errata BR-1 and BR-2, page 79.

SC-15

The comment is noted. While native grassland is still present, it is not as common as it once was.

SC-16

This map has been included. Please refer to Exhibit 2-RC.

SC-17

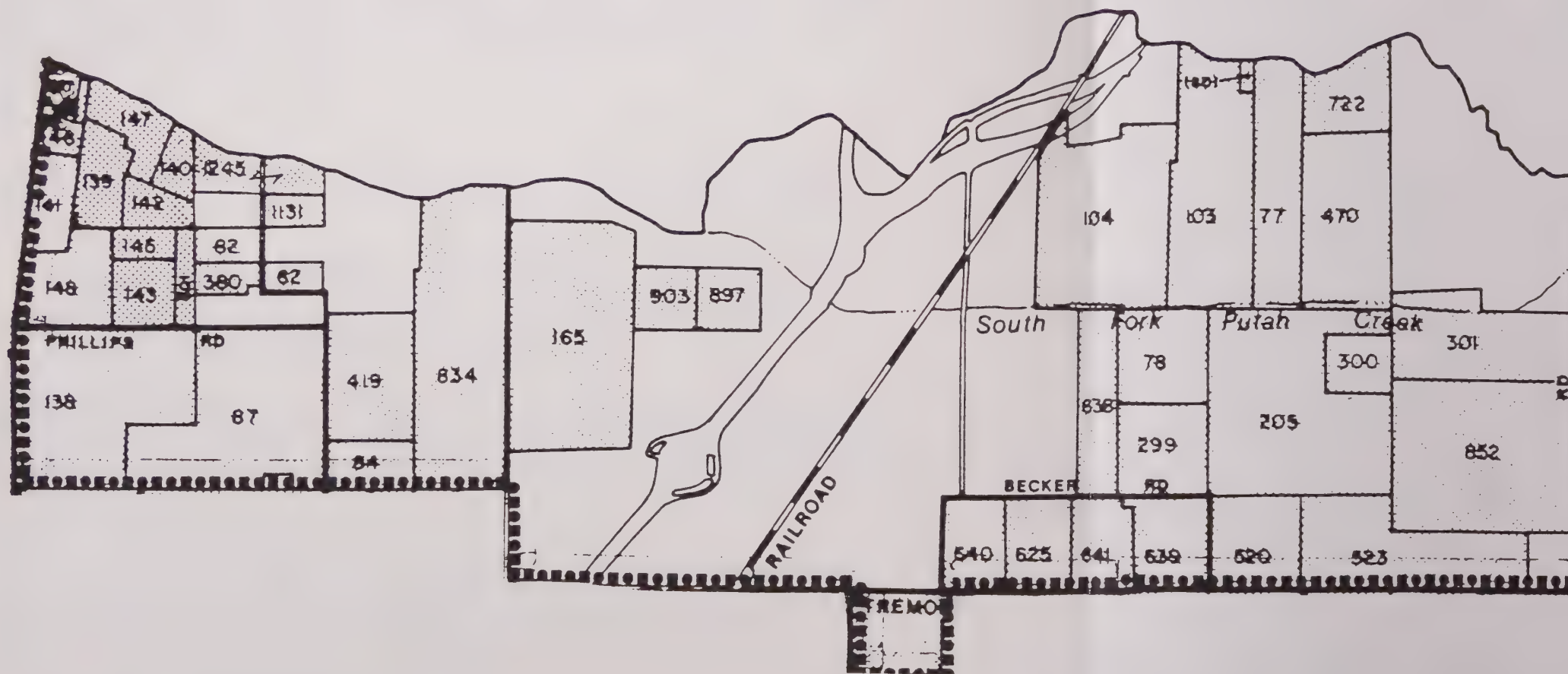
The comment is noted. This map was unavailable at the time of this writing.

SC-18

Exhibit 15 shows only general locations of Swainson's Hawk nest and is not intended to identify specific nest sites.

SC-19

The comment is noted. This farmland area is valuable foraging and nesting habitat for unique and threatened raptor species.



LEGEND

- PRIME LANDS
- NON-PRIME LANDS
- CONTRACT NUMBER
- INCORPORATED AREA
- CANCELLED CONTRACTS
- NON-RENEWAL FILED
- DISAPPROVED APPLICATIONS
- EXPANDED CITY BOUNDARIES
- EXPANDED CITY BOUNDARIES WITHIN POPULATION OF 25,000
- EXPIRED CONTRACTS

Source: Solano County Planning Department

SOLANO COUNTY WILLIAMSON ACT CONTRACT LANDS
 OPEN SPACE ELEMENT EIR RESPONSE TO COMMENTS
 City of Davis

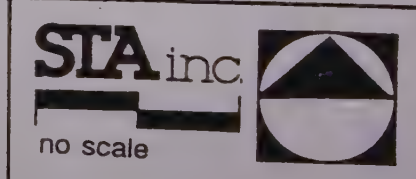


Exhibit 1-RC

SC-20

Alfalfa and cut wheat does contribute to good foraging habitat. The 1% figure for dryland pasture is defined from Estep (1984).

SC-21

The comment is noted. Many sensitive wildlife species no longer occur in the General Plan Study area due to the lack of sufficient amount and/or quality of habitat. The Putah Creek corridor does contain important riparian vegetation and habitat, but not at levels that it had existed at historically.

SC-22

The purpose and scope of an Environmental Impact Report (EIR), as defined by the Section 15002 of the California Environmental Quality Act (CEQA), are as follows:

"An Environmental Impact Report (EIR) is the public document used by the governmental agency to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid the possible environmental damage."

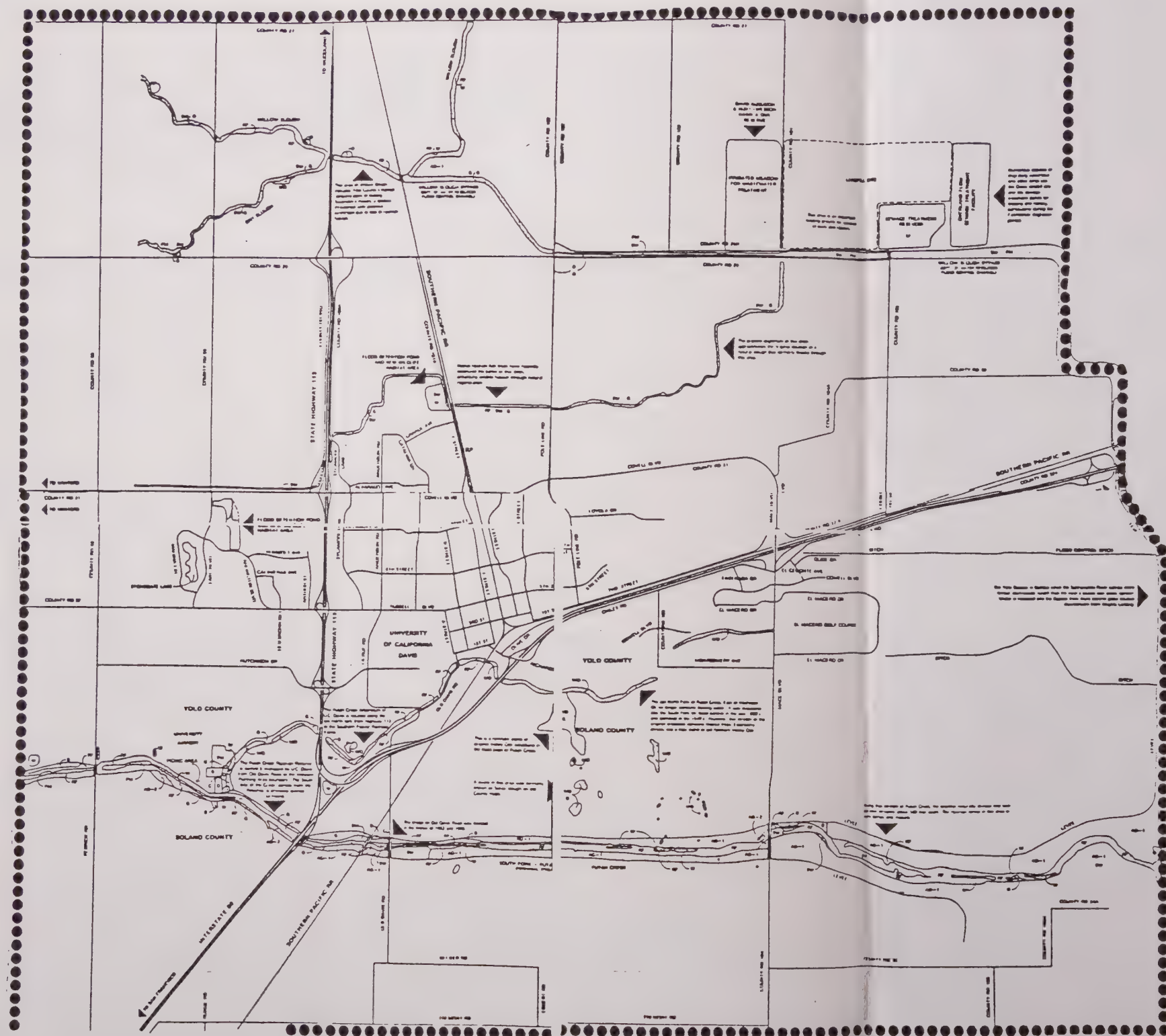
The objective of the Open Space Element EIR is to identify environmentally impacts and discuss mitigation measures. Discussion of recreational benefits is forwarded to appropriate decisionmakers. Recreational benefits shall be discussed in the Statement of Overriding Considerations.

SC-23

The comment is noted and forwarded to the appropriate decisionmakers.

SC-24

Exhibit 16 was identified on page 106 of the Biology section of the EIR as being only conceptual. Paragraph 3, page 106 states, "Exhibit 16 depicts a Conceptual Enhancement Plan that should be taken into consideration during the implementation of the Revised Open Space Element.



WETLAND AND RIPARIAN HABITATS

IN THE 1987 DAVIS GENERAL PLAN STUDY AREA

BY THE CITY OF DAVIS
PROPOSITION 70 TASK FORCE
FEBRUARY 22, 1989

CODE	HABITAT
WETLANDS	
RF	RIPARIAN FOREST: ASH, COTTONWOOD, BOXELDER, WILLOWS
PM	PERMANENT MARSH: CATTAIL, TULE, BULRUSH, SEDGES
SW	SEASONAL WETLAND, SEASONALLY FLOODED HABITATS
W	WATER: PERMANENT OPEN WATER MOST OF THE YEAR
UPLANDS	
G	GRASSLAND: ANNUAL GRASSLAND OR FALLOW FIELDS
WD	WOODLANDS: VALLEY OAK, WALNUT, ELDERBERRY
OTHER MAN-MADE ENVIRONMENTS	
B	BARE OR RUDERAL WEEDY VEGETATION
D	DEVELOPED: PAVING AND STRUCTURES
L	LEVEES FOR FLOOD CONTROL
AG-1	AGRICULTURE: FIELD CROPS
AG-2	AGRICULTURE: ORCHARDS & VINYARDS
AG-3	AGRICULTURE: WINDBREAKS & WOODLOTS

Source: City of Davis (Proposition 70 Land Acquisition Task Force 1989)

PROPOSITION 70 MAP WETLAND AND RIPARIAN AREAS

OPEN SPACE ELEMENT EIR RESPONSE TO COMMENTS

City of Davis

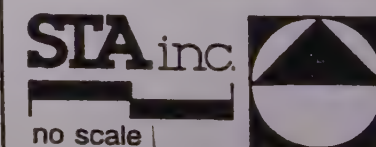


Exhibit 2-RC

SC-25

The comment is noted. While there are situations where vernal pools have formed in association with Valley Oaks, the Sykes Slough site may not be appropriate. The feasibility of restoration of vernal pools should be explored at other sites in the planning area.

SC-26

Please refer to Comment DL-9, letter from the County of Yolo, June 7, 1990.

SC-27

Please refer to SC-26.

SC-28

Please refer to SC-26.

DAVIS AUDUBON SOCIETY (DAS)

DAS-1

The comment is noted. The City of Davis Proposition 70 report map is included in Exhibit 2-RC. The Yolo County Wetlands and Riparian Areas Inventory was not available at the time of this writing.

DAS-2

The comment is noted and forwarded to the appropriate decisionmakers.

DAS-3

The comment is noted.

DAS-4

Please refer to DAS-1.

DAS-5

Please refer to SC-18, page 32.

DAS-6

The comment is noted.

DAS-7

The comment is noted.

DAS-8

The concern for additional species is noted.

DAS-9

The comment is noted and additional habitat areas acknowledged.

DAS-10

Please refer to DAS-5.

DAS-11

Recreational impacts are discussed in the Public Services and Utilities section of the EIR. Please refer to KT-2A, page 6, and KT-10, page 9.

DAS-12

Please refer to SC-22, page 30.

DAS-13

Please refer to SC-22, page 30.

DAS-14

The comment is noted. While Estep (1984) did not call out the Putah Creek corridor as a nesting area for the Swainson's hawk, higher quality riparian vegetation exists here than on Dry or Willow Slough.

DAS-15

The comment is noted.

DAS-16

The comment is noted. Please refer to Errata BR-3, page 80.

JOHN WHITCOMBE (JW)

JW-1

The comment is noted and forwarded to the appropriate decisionmakers.

JW-2

Please refer to KT-2A and KT-10, pages 6 and 9.

JW-3

The City of Davis Police and Fire Departments were consulted with during the preparation of the EIR. Responses to utility questionnaires were used to determine impacts and mitigation measures for police and fire services. Please refer to the Public Services and Utilities section of the EIR.

JW-4

The comment is noted. Consultation with the City of Davis Fire Department did not identify brush fires as a potential impact. Further discussion is deferred to site-specific components of the Open Space Element.

JW-5

The comment is noted.

HEIDRICK FARMS (HF)

HF-1

The future Fiscal report section describes how land will be secured for open space uses other than agriculture. Property rights and acquisition of land use rights will be discussed in future environmental analysis as each specific Open Space component is proposed. Please refer to KT-2A, page 6.

HF-2

Land use incompatibility associated with increased wildlife populations on adjacent agricultural and land use compatibility between the Nature Reserve/Wildlife Habitat/Wetlands and adjacent agricultural uses are considered impacts that can be partially mitigated. Please refer to the Land Use section. Detailed analysis will occur in review of specific Open Space components.

HF-3

The comment is noted. It is anticipated that much of the greenbelt will remain in agricultural use. Initially, only the first 100 feet extending out from the City will be for public access. Further discussion will take place during review of specific Open Space components.

HF-4

Please refer to KT-4, page 8.

HF-5

Please refer to SC-11, page 31.

HF-6

Irrigation water and drainage issues will be discussed in environmental documentation as specific Open Space components are proposed. Please refer to KT-10, page 9.

HF-7

Please refer to KT-10, page 9.

DENNIS WESCOTT (DW)

DW-1 to DW-4

The effects of selenium on waterfowl has been identified as a concern in the Central Valley of California. Irrigation of cropland can cause leaching of selenium and other heavy metals from the soil allowing them to accumulate in standing or stagnant bodies of water. The accumulation of selenium can cause detrimental effects to waterfowl. The United States Fish and Wildlife Service (USFWS) suggest a 2 parts per billion (ppb) limit on selenium levels for sustaining wetlands (phone conversation, Stephen Moore, Drainwater Studies Coordinator, San Joaquin Valley Drainage Program, USFWS).

Although levels differ according to source, selenium has been detected in all sources of water being discussed in potential use for the Wetland Habitat Area. Monthly records show levels of selenium at the Water Pollution Control Plant to range from 1 ppb to 12 ppb in both the effluent and receiving stream. Methods do exist for stripping selenium from water. Consultant recommends that the issue of selenium contamination be further analyzed in site-specific open space components.

DW-5

This alternative was determined infeasible due to the possibility of excessive flooding as well as other issues.

MARK FRANCIS (MF)

MF-1

Please refer to SG-1, page 27.

MF-2

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

MF-3

Please refer to SC-22, page 34.

MF-4

Please refer to KT-3, page 7.

MF-5

The comment is noted. City staff have recommended that the following policy language of the Open Space Element be amended as follows:

3.3.E. Develop the Davis Greenbelt to have segments which vary in overall size and configuration, level of development, and type of intended activity. Follow property lines where feasible when establishing the boundaries. [At

the northeast and northwest portions that are adjacent to Covell and Mace Boulevards, the widths should be greater to separate public use and traffic impacts.]

MF-6

The comment is noted. The "Radial" concept was analyzed as an Alternative in the EIR and was consequently recommended for removal from further consideration.

MF-7

The comment is noted. The reference is listed as follows: Francis, M., K. Dawson and S. Jones. "The Davis Greenway Plan." Davis: Center for Design Research, UCD. 1987.

CITY OF WOODLAND (CW)

CW-1

The comment is noted and forwarded to the appropriate decisionmakers.

DONNA LANDEROS (DL)

DL-1

The comment is noted. Please refer to KT-10, page 9.

DL-2

Please refer to DL-1.

DL-3

Please refer to DL-1.

DL-4

Please refer to DL-1.

DL-5

These numbers assume the County's ability to subdivide property to 20 acre lots, as evidenced in the Powell lot-split.

DAVID NUNENKAMP (OPR)

OPR-1

The comment is noted and forwarded to the appropriate decisionmakers.

PETE BONTADELLI (CDFG)

CDFG-1

The comment is noted and forwarded to the appropriate decisionmakers.

CDFG-2

The comment is noted. A detailed Mitigation Monitoring Program will be developed for the proposed project.

CDFG-3

Please refer to CDFG-1.

CDFG-4

Please refer to CDFG-1.

CDFG-5

Please refer to CDFG-1.

RICHARD P. MCHENRY (RM)

RM-1

Please refer to DW-1, page 40.

RM-2

The comments are noted and forwarded to the appropriate decision makers. Please refer to DW-1, page 40.

RM-3

The comments are noted and forwarded to the appropriate decision makers. Please refer to DW-1, page 40.

BILL STRENG (BS)

BS-1

Please refer to KT-3, page 7.

PLANNING COMMISSION COMMENTS INDEX
MAY 15, 1990

NAME	STATUS	DATE	ACRONYM
Mark Francis	Resident	5-15-90	MF
Steve Greco	Resident	5-15-90	SG
Kathryn Tobias	Attorney	5-15-90	KT
Dennis Wescott	Resident	5-15-90	DW
Will Carlton	Planning Commission	5-15-90	WC
Priscilla Walton	Planning Commission	5-15-90	PW
Donna Lott	Planning Commission	5-15-90	DL
Larry Garrett	Planning Commission	5-15-90	LG
Donald Moore	Planning Commission	5-15-90	DM

PLANNING COMMISSION COMMENTS

MAY 15, 1990

MARK FRANCIS (MF)

Comments

MF-1

The 100 foot average width is inadequate for public access.

MF-2

Diverse vegetation, drainage channels, sports fields.

MF-3

Covell Greenbelt - Minimum 100 - average 400 feet. A or B minimum of 200 - average 400 feet. Putah Creek minimum of 200 feet - average 600 feet.

MF-5

The recreational benefits of the project need to be explained more fully in the EIR.

MF-6

The alignment of the Greenbelt along Covell Road should be examined in the EIR.

MF-7

The Design Alternative should show more impacts than it presently does in the Alternatives section.

Response to Comments

MF-1

Please refer to SG-1, page 27.

MF-2

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

MF-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

MF-4

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

MF-5

Please refer to SC-22, page 34.

MF-6

Please refer to MF-5, page 41.

MF-7

Please refer to MF-6, page 42.

STEVE GRECO (SG)

Comments

SG-1

How can the project result in both a loss of housing and a loss of prime agricultural land?

SG-2

The Radial Alternative does not meet the objectives of the proposed project.

SG-3

Location of Greenbelt. Need more than 100 foot minimum. Lost opportunity. Attract people to come to Davis.

SG-4

Alignment - Lack of ability to get across I-80.

Response to Comments

SG-1

Analysis of impacts to existing land use conditions, or "plan-to-ground" conditions indicates that implementation of the proposed program would result in a loss of agricultural lands. Analysis of impacts to Land Use Plans or, "plan-to-plan" conditions indicates that implementation of the proposed program may preclude the use of such areas for housing.

SG-2

Please refer to MF-6, page 42.

SG-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

SG-4

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

KATHRYN TOBIAS (KT)

Comments

KT-1

Just received a copy of the EIR and would like to make comments at the Planning Commission meeting on May 29, 1990.

Response to Comments

KT-1

The comment is noted.

DENNIS WESCOTT (DW)

Comments

DW-1

The impact of selenium on biological resources in the Wetland Habitat area should be addressed in the EIR. The impacts of the wetland creation to water fowl should be looked at. Selenium is in wastewater. Note this as a significant impact with mitigation.

DW-2

Include 100 million dollars to fix water quality. Wetland contamination. Alternative by creating a wetland in Yolo Bypass. Look into U.S. Fish and Wildlife Service for guidelines. Larry Garrett - natural pollutant, not covered in EIR now.

Response to Comments

DW-1

Please refer to DW-1, page 40.

DW-2

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California

Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

WILL CARLTON (WC)

Comments

WC-1

The Lack of water issue needs to be addressed in the EIR.

WC-2

The issue of leapfrog development needs to be addressed in the EIR.

WC-3

Acquisition costs for water should be analyzed in the EIR.

Response to Comments

WC-1

It is recognized that water use in the maintenance of greenbelt areas is an important issue. Mitigation measures as identified in the Public Services and Utilities section of the EIR call for the review of specific components of the Open Space Element by the Department of Public Works to ensure the provision of adequate water supplies. Please refer to the Initial Study located in Appendix A of the Draft EIR for discussion of tiered documents.

WC-2

Please refer to KT-38, page 14.

WC-3

Fiscal considerations for the acquisition of water rights will be addressed in the fiscal analysis of the implementation plan.

PRISCILLA WALTON (PW)

Comments

PW-1

The issue of minimum public access widths in the Davis Greenbelt needs to be addressed in the EIR. What would the impacts be if the minimum width of the public access area of the project is a 250 foot minimum with a 500 foot average?

PW-2

Water issues need to be addressed in terms of availability and selenium.

Response to Comments

PW-1

Please refer to SG-1, page 27.

PW-2

Please refer to DW-1, page 40.

DONNA LOTT (DL)

Comments

DL-1

The summertime recharge in Putah Creek should be analyzed in the EIR.

DL-2

Is there a problem with high ground water levels adjacent to the landfills?

DL-3

Camping areas?

Response to Comments

DL-1

The issue will be discussed in analysis of specific Open Space components.

DL-2

Please refer to DL-1.

DL-3

Please refer to DL-1.

LARRY GARRETT (LG)

Comments

LG-1

Does the cumulative analysis for the EIR match the cumulative analysis for the General Plan?

LG-2

Will submit written comments at a later date prior to the ending of the 45 day review period.

Response to Comments

LG-1

The Davis General Plan EIR indicates cumulative impacts on prime agricultural land and growth rates of adjacent communities. The Open Space Element EIR assesses cumulative impacts by section and in greater detail. Please refer to page 46 of the Davis General Plan EIR for further information.

LG-2

The comment is noted.

DONALD MOORE (DM)

Comments

DM-1

How much agricultural land will be lost?

Response to Comments

DM-1

Under CEQA the loss or impairment in use of prime agricultural land is considered a significant impact.

The total prime agricultural land to be converted under the Revised Open Space Element is approximately 1,483 acres. This is an approximate figure that does not include Area B of the proposed Yolo Basin Wildlife Area. Please refer to Table E in the Land Use section of the EIR for further details.

PLANNING COMMISSION COMMENTS

MAY 29, 1990

NAME	STATUS	DATE	ACRONYM
<hr/>			
Nancy Price	Planning Commission	5-29-90	NP
Priscilla Walton	Planning Commission	5-29-90	PW
Kathryn Tobias	Attorney	5-29-90	KT
William Carlton	Planning Commission Chair	5-29-90	WC
Steve Chainey	Putah Creek Council	5-29-90	SC
Donna Lott	Planning Commissioner	5-29-90	DL
Richard Hoffmann	Planning Commissioner	5-29-90	RH

PLANNING COMMISSION COMMENTS
MAY 29, 1990

NANCY PRICE (NP)

Comments

NP-1

When feasible, set annual or two to five year goals in the fiscal analysis.

NP-2

The satellite city issue needs to be addressed. Does it need to be addressed in the EIR?

NP-3

Design features should be emphasized, e.g. vegetation. Don't overdesign or overlandscape. This is important in terms of cost and design.

NP-4

Land use and mitigation measure issues relate to how open space components are linked in the County. Relates to Ms. Tobias' comments.

NP-5

The satellite city is appropriately addressed at a regional level.

Response to Comments

NP-1

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

NP-2

The satellite community plan was discussed prior to preparation of the EIR and was rejected from further consideration. Please refer to PD-1 in the NOP/Scoping Responses to Comments and KT-1C, page 5.

NP-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

NP-4

Please refer to KT-2A and KT-10, pages 6 and 9.

NP-5

The comment is noted. Please refer to NP-2.

PRICILLA WALTON (PW)

Comments

PW-1

How does the Davis Trust fit in to the open space plan?

PW-2

The plan has great benefits. The question is how to implement it. We're at a broad conceptual level.

PW-3

The City Council should reconsider calling the Davis Greenbelt the "greenway."

PW-4

Address how components will connect as Commissioner Price said.

Response to Comments

PW-1

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

PW-2

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

PW-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

PW-4

Please refer to KT-2A and KT-10, pages 6 and 9.

KATHYRN TOBIAS (KT)

Comments

KT-1

Will submit comments in writing prior to the end of the review period. Two major concerns. First, the Draft EIR doesn't adequately assess public access and agricultural practice issues including drainage practices. Therefore, the alternatives and cumulative analyses are also incomplete.

KT-2

The EIR does not address a reasonable range of alternatives. It should discuss another alternative that would allow for less restrictive uses (e.g. large lot zoning, clustered housing, and a transfer of development rights program). The EIR needs to look at how else project objectives can be accommodated.

KT-3

The second major concern is that some kind of fiscal impact analysis is needed. Otherwise the plan lacks power. Treat this issue in the alternatives discussion.

KT-4

If leapfrog development occurred, then the property owners represented would want a transfer of development rights program.

KT-5

The impacts of the mitigation measures should be looked at, but not at the same level of analysis as the rest of the EIR.

KT-6

A satellite city concept should be looked at in the alternatives analysis.

KT-7

Need to look at the level of specificity in the EIR. If this project is just at the policy and concept level, then the level of analysis in the EIR is adequate. If the designations will be tied to specific properties, then the EIR level of detail is not appropriate.

Response to Comments

KT-1

The City of Davis Department of Public Works was contacted regarding drainage during preparation of the EIR. Mitigation Measure 28 recommended that the Department review all project-specific components of the Open Space Element for drainage impacts prior to approval. Please refer to the Public Services and Utilities section of the EIR. The City of Davis Police Department and Department of Parks and Recreation were contacted regarding public access. They will also review all Open Space components as they are proposed.

KT-2

Please refer to KT-1C, page 5.

KT-3

Please refer to KT-3, page 7.

KT-4

The comment is noted. Please refer to KT-2A, page 6.

KT-5

Please refer to Errata LU-1 on page 77.

KT-6

Please refer to KT-1C, page 5.

KT-7

Please refer to KT-2A and KT-10, page 6 and page 9.

KT-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

WILLIAM CARLTON (WC)

Comments

WC-1

We may want to take "satellite city" out of mitigation measure 3 in the Land Use section.

WC-2

In the June issue of National Geographic magazine, there is an article on greenway systems. A greenway system is different than a greenbelt. The current drought is a concern.

WC-3

The legal aspects are troubling [the level of specificity of the EIR]. Do we have to get into it in the EIR?

Response to Comments

WC-1

The comment is noted. Please refer to Errata LU-1 on page 77.

WC-2

Please refer to the following response excerpted from the City Planning Commission Hearing, May 29, 1990.

"The term "Davis Greenway" was introduced in the original work done at the University discussed in Response #6. However, the City Council decided early this year to use the name Davis Greenbelt. Consequently, staff has removed all references to the Davis Greenway from the policies under consideration. therefore, no confusion should exist as to terminology. Although staff is not prepared to recommend that the public access portion be called the Davis Greenway, the Planning Commission is of course free to make that suggestion to the City Council."

WC-3

Please refer to KT-2A and KT-10, page 6 and page 9.

STEVE CHAINEY (SC)

Comments

SC-1

Submitted a letter at the hearing. Highlighting points from the letter.

p. 11, Table A. Confusion over acreage. A lot of acreage is attributed to the Nature Reserve/Wildlife Habitat/Wetlands designation. Doesn't jive with what they (the Council) know about areas A and B of the Yolo Basin Wildlife Refuge. Only 20% of areas A and B will be used to create wetlands. The EIR overestimated the acreage.

11 miles multiplied by 200 feet. Arithmetic problems. Therefore, the impact analysis should be redone.

SC-2

There are Class III and Class IV lands in the proposed wetlands area which are not prime.

SC-3

Don't like that the Nature Reserve/Habitat/Wetlands designation analysis says that the increase in wildlife will impact adjacent agricultural lands. This is not appropriate in an EIR on an open space element. There is no evidence that complex ecosystems (e.g. near Putah Creek) creates wildlife problems for agricultural operations.

SC-4

Disappointed in the biology analysis-- skimpy. The vegetation supported by Putah Creek is not minor.

SC-5

Some resources regarding biological resources was not used. An extensive map showing riparian areas has been prepared (submitted at the hearing). Also, Yolo County has recently mapped wetland resources.

SC-6

Exhibit 16 should be removed from the text. Put it in an appendix. It is just a concept. It is confusing--thought it was a proposed plan.

SC-7

The impact analysis should focus on the benefits of the plan. The benefits outweigh the impacts.

SC-8

I suggest stronger and more explicit mitigation measures and recommendations. Need ordinances regarding:

- native trees
- riparian habitats

There are examples of these ordinances from other jurisdictions.

SC-9

The EIR should recognize that the plan can include significant amounts of agriculture.

SC-10

Another significant benefit is that groundwater recharge areas can help avoid flooding problems.

Response to Comments

SC-1

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and will be included in future City staff reports.

SC-2

Discussion of impacts of wildlife on prime agricultural lands is discussed based on Appendix G of the California Environmental Quality Act (CEQA) identifies activities that, ". . . impair the agricultural activity of prime agricultural land. . ." as being significant impacts. Further discussion on wildlife problems is deferred to project-specific environmental documentation.

SC-3

Please refer to SC-11, page 31.

SC-4

The intent of the Biology section was not to document all species in 84 square mile area, but only a general overview of predominant wildlife species.

SC-5

The comment is noted. A copy of the recently mapped Yolo County wetlands was not available at the time of this writing.

SC-6

Please refer to SC-24, page 34.

SC-7

The comment is noted. Please refer to SC-22, page 34.

SC-8

The comment is noted. Discussion of specific Open Space Components is beyond scope of this project. Further discussion is forwarded to the appropriate decisionmakers.

SC-9

The comment is noted. Table A indicates acreage of Agricultural Preserve and Agricultural Open Space that would exist under the proposed Open Space Element components. Significant amounts of agriculture will also exist in Greenbelt and Nature Reserve/Wildlife Habitat/Wetlands.

SC-10

Please refer to SC-22, page 34.

DONNA LOTT (DL)

Comments

DL-1

Support Steve Chainey's comments about the maps. Proposition 70 task force maps are easy to incorporate as well as the County's study. They would help address the TDR issue.

DL-2

Confused by Exhibit 16.

DL-3

A satellite city should be addressed in the EIR as an alternative.

DL-4

A campground is a good amenity.

Response to Comments

DL-1

Please refer to SC-5, page 30.

DL-2

Please refer to SC-6, page 30.

DL-3

Please refer to KT-1C, page 5.

DL-4

Please refer to SC-22, page 34.

RICHARD HOFFMANN (RH)

Comments

RH-1

Need a fiscal analysis.

RH-2

Like the TDR concept.

RH-3

Shouldn't discuss the satellite city.

RH-4

Agricultural impacts are a concern.

Response to Comments

RH-1

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

RH-2

Please refer to KT-67, page 22.

RH-3

Please refer to KT-1C, page 5.

RH-4

The comment is noted. Please refer to the Land Use section of the EIR for a discussion of impacts to agriculture.

JOINT HEARING
NATURAL RESOURCE COMMISSION AND PARKS
AND RECREATION COMMISSION
MAY 23, 1990

NAME	STATUS	DATE	ACRONYM
Rubin Lopez	Parks and Recreation Commissioner	5-23-90	RL
Joan Sallee	same	5-23-90	JS
Don Morrill	same	5-23-90	DM
Lois Wolk	same	5-23-90	LW
Marla Cook	same	5-23-90	MC
Yvonne Marsh	same	5-23-90	YM
Cynthia Marvin	Natural Resources Commissioner	5-23-90	CM
2nd from Cynthia	same	5-23-90	2nd
3rd from Cynthia	same	5-23-90	3rd
Ed Whisler	Davis Audubon Society	5-23-90	EW

JOINT HEARING COMMENTS
MAY 23, 1990

RUBIN LOPEZ (RL)

Comments

RL-1

When will the recalculation of potential housing units be done?

RL-2

We should leave the name issue [of the greenbelt] alone. It was voted upon months ago.

RL-3

Suggest that the Commissions say that they support the open space plan concept, but take no position on the fiscal aspects since there is no fiscal information available.

Response to Comments

RL-1

Recalculation of housing units will be available for the June 20, 1990 City Council meeting.

RL-2

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

RL-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

JOAN SALLEE (JS)

Comments

JS-1

What two areas of the Davis Greenbelt will be widened?

JS-2

Is there an assumption that this will be approved without a fiscal analysis?

JS-3

I'm more interested in Francis' suggestion that a 100 foot public access-way is not wide enough. What's the City's response?

JS-4

I feel concerned about supporting the concept without a fiscal report. This is an enormous project that has moved fast.

Response to Comments

JS-1

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

JS-2

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

JS-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

JS-4

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

DON MORRILL (DM)

Comments

DM-1

Will the plant species be drought tolerant? What about maintenance?

Response to Comments

DM-1

Please refer to the City policy on drought tolerant plant species located in the Open Space Element.

LOIS WOLK (LW)

Comments

LW-1

Public access-ways will be financed through a bond? You said it was in Major Projects financing. If you increase the public access width, you increase the bond issue. When will the fiscal analysis be prepared?

LW-2

This is a large project with great magnitude.

LW-3

Concerned about Marc Francis' letter which discusses the name "Davis Greenbelt." Wants it to be called the Davis Greenway, especially the public access areas. I like the term "greenway." This was a unique proposal.

Response to Comments

LW-1

Please refer to KT-3, page 7.

LW-2

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

LW-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

MARLA COOK (MC)

Comments

MC-1

Not clear on where greenbelt comes together at Crossroads.

MC-2

We already have a leash law. Take it out of mitigation measure 17. Say berms, vegetation, fences, and other barriers.

MC-3

Add "and wildlife" to Policy D on page 25 of the Staff Report.

MC-4

I want the greenbelt to look different than a housing development with a bikepath.

MC-5

Call the entire plan the "Greenway Plan" which would include the various names as currently proposed.

MC-6

Give credit in the Open Space element of those who came up with the idea. Acknowledge the origin.

Response to Comments

MC-1

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

MC-2

Please refer to Errata BR-3, page 80.

MC-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

MC-4

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

MC-5

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

MC-6

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

YVONNE MARSH (YM)

Comments

YM-1

Did the \$11 million include acquisition from developers?

YM-2

We should accept the Audubon Society comments.

Response to Comments

YM-1

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California

Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

YM-2

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

CYNTHIA MARVIN (CM)

Comments

CM-1

Faced with another project that has no fiscal analysis.

CM-2

Can we get more specific about sensitive habitat areas within the greenbelt?

CM-3

Add a guiding policy to protect environmentally sensitive areas in the greenbelt.

CM-4

The name "Greenway" would make people think of water. The Natural Resources Commission is looking at water conservation measures now.

Response to Comments

CM-1

Please refer to KT-3, page 7.

CM-2

Please refer to KT-2A and KT-10, page 6 and page 9.

CM-3

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

CM-4

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

SECOND PERSON FROM CYNTHIA (2nd)

Comments

2nd-1

What about the leash law to protect the burrowing owls?

Response to Comments

2nd-1

Please refer Errata BR-3, page 80.

THIRD PERSON FROM CYNTHIA (3rd)

Comments

3rd-1

What if an agricultural owner in the greenbelt wants to develop?

Response to Comments

3rd-1

This comment does not address the completeness or adequacy of the Draft EIR, does not raise significant environmental issues, or request additional information. A substantive response to this comment is not appropriate within the context of the California Environmental Quality Act. The comment will be forwarded to City staff and major issues will be included in future City staff reports.

ED WHISLER, DAVIS AUDUBON SOCIETY (EW)

Comments

EW-1

I will follow up with a letter. Our comments relate to the Biology section of the EIR.

p. 103 - neglect Putah Creek as an important Swainson's Hawk nesting area.

EW-2

Exhibit 15 shows the map of Swainson's Hawk nests. It is not appropriate to locate endangered species.

EW-3

The EIR does not look at some other natural habitat areas including the Hunt-Wesson preserve, the West Pond and North Pond (both are managed habitat areas), and the Davis sewage treatment and overland flow facilities.

EW-4

Exhibit 15 is incomplete. Include information from the Proposition 70 Task Force report.

EW-5

p. 109 - mitigation measure 9 should also include the northeast, northwest, and southeast areas of the Planning Area. Only the northwest area was identified.

EW-6

p. 110 - the mitigation measure for the Valley Elderberry Longhorn Beetle (VELB) should state that pesticides will be restricted. The VELB is sensitive to pesticides.

EW-7

Appendix E to the EIR contains the biology report. Appendix A to the biology report lists recommended plant species. The giant reed should be deleted from this list since it has little wildlife value.

Response to Comments

EW-1

Please refer to DAS-14, page 38.

EW-2

Please refer to DAS-5, page 32.

EW-3

Please refer to KT-2A, page 6.

EW-4

The comment is noted. Maps identifying wetland and riparian habitats have been included in Exhibit 2-RC on page 35.

ERRATA

The following are corrections to the Draft EIR as indicated in comments received from Planning Commission Hearings, Natural Resource Commission and Parks and Recreation Commission Hearings, and Written Comments.

PD-1

Changes to page 13, Required Discretionary Actions, are made as follows:

4. **Specific Plan Amendment.** An amendment to the South Davis *and East Davis* Specific Plan Map to bring it into consistency with the Revised Open Space Element.

PD-2

The following section is deleted as indicated:

5. ~~**Fiscal Analysis.** Although not a required discretionary action, the Fiscal Analysis for the Open Space Element will be accepted as being complete.~~

PD-3

Refer to Exhibit A of the General Plan Amendment Resolution, City Council Hearing, June 20, 1990.

PD-4

The following changes are made to Table B, page 20 of the Draft EIR:

Aspen:	264 Apartments
	66 Affordable Apartments
	300 single family and cluster units
	9 acre school site
	3 acre park site
	4.4 acre greenbelt
	5 acre additional pond
	8.8 acre professional administration
	4 acre pond greenbelt
	110 acre total

LU-1

Mitigation Measure 3 on page 45 of the Draft EIR is changed to read as follows:

3. In order to minimize the loss of prime agricultural land the City shall pursue the following policies:
 - a. Redevelopment and infill of areas within the urban area.
 - b. Development on non-prime soils.
 - c. The establishment of a Greenbelt as an urban/rural boundary.

LU-2

Please refer to Exhibit 8.

LU-3

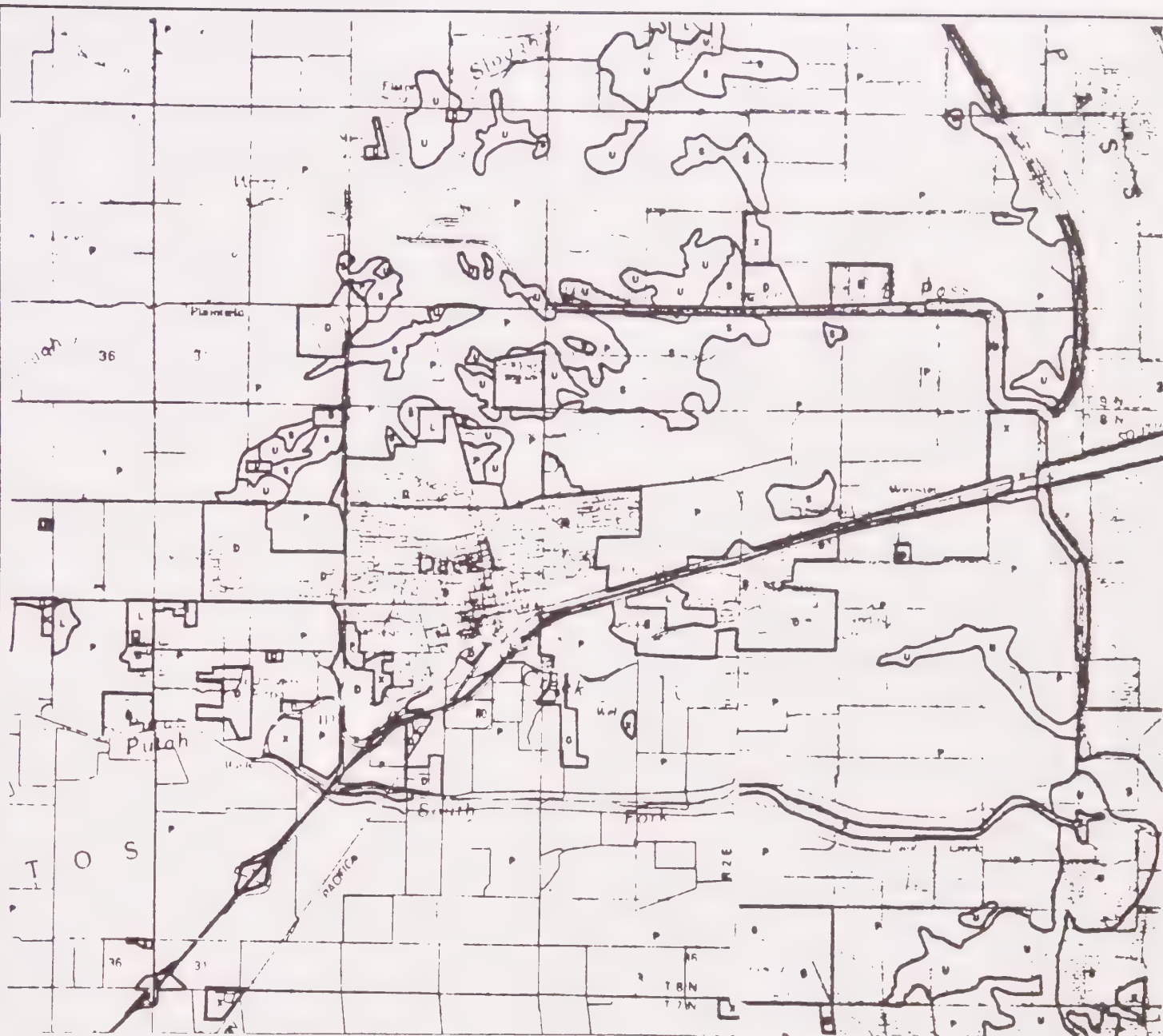
Table D, page 32, second column is changed to read, '1986.'

LU-4

Mitigation Measure 1 on page 45 of the Draft EIR and in any subsequent reference is changed as follows:

As the Davis Greenbelt and other components of the Open Space Element are implemented ~~is planned for development, the potential to mitigate land use~~ compatibility impacts between ~~development~~ residential and existing agricultural uses shall be ~~evaluated~~ *mitigated through the use of buffer areas, spray easements, and other means of restricting aerial spraying as required by Open Space Element Policy 3.4.A.*

Furthermore, [t]iered environmental documentation, as provided under CEQA Section 15152, shall be conducted as the revised Open Space Element is implemented and specific projects are proposed. This documentation and any future monitoring programs shall further analyze the impact of the proposal on existing land uses and resources.



- | | |
|---|----------------------------------|
| P PRIME FARMLAND | G GRAZING LAND |
| S FARMLAND OF STATEWIDE IMPORTANCE | D URBAN AND BUILT-UP LAND |
| U UNIQUE FARMLAND | X OTHER LAND |
| L FARMLAND OF LOCAL IMPORTANCE | |

Source: Department of Conservation, 1986

IMPORTANT FARMLANDS MAP

OPEN SPACE ELEMENT EIR
City of Davis

STA inc.
no scale



Exhibit 8

LUP-1

Sentence 1, page 56 of the Draft EIR is changed to read:

"The County contains 1,034 square miles of lands and is situated near the southern end of the Sacramento Valley immediately west of Sacramento *County*."

LUP-2

Changes to Exhibit 12 of the Draft EIR are made as follows:

Solano County

Add: CS - Commercial Service
CH - Commercial Highway

LUP-3

On page 78 of the Draft EIR, (and in applicable summaries) under "East Davis Specific Plan," delete:

"No impacts are anticipated."

and insert the following text:

"An amendment will be necessary to the East Davis Specific Plan Map to depict the Davis Greenbelt. A mitigation measure for this land use plan impact is provided on the following pages."

LUP-4

Mitigation Measure # 5 on page 81 of the Draft EIR and in any subsequent reference is changed to read as follows:

- "5. Approval of the project by the City Council shall not occur until consistency with the South Davis *and East Davis* Specific Plan map is achieved or unless the Specific Plan maps is amended to be consistent with the Revised Open Space Element."

BR-1

Page 100, paragraph 1, sentence 5 of the Draft EIR is changed to read:

Extensive emergent marsh occurred over much of what is now the Yolo Bypass *and low-lying land west of the Bypass.*

BR-2

Page 100, paragraph 2, sentence 3 of the Draft EIR is changed to read:

"The most natural areas include the riparian communities along the *South Fork of Putah Creek*, marshy pockets along scattered sloughs and ditches, and a remnant oak savanna at the proposed Sykes Slough Nature Reserve, and along portions of *Willow and Dry Sloughs.*"

BR-3

Mitigation Measure 17 on page 109 of the Draft EIR is changed to read:

"17. On sections of trail that cannot significantly avoid owl dens, the City shall erect at least a low fence or other barrier or a taller fence."

BR-4

Mitigation Measure 9 on page 109 of the Draft EIR and in all subsequent reference is changed as follows:

"9. The City shall protect existing resources provided by existing trees and cropland and pasture for Swainson's hawks, particularly in the northwestern quadrant of the study area. ~~The California Department of Fish and Game (CDFG) recommends alfalfa (40%), dry pasture or native grassland (20%), dished fields with hedgerows (20%), and row crops (20%) as a cover mix suitable for Swainson's hawks.~~ *If these resources are reduced or eliminated, adequate replacement habitat shall be provided.*"

BR-5

Mitigation Measure 11 on page 109 of the Draft EIR and in all subsequent reference is changed as follows:

"11. This City shall avoid direct disturbance to habitats by *avoiding* construction activities during critical nesting and breeding season, typically March to June."

CR-1

Mitigation Measure 22 on page 113 of the Draft EIR and in all subsequent reference is changed as follows:

- "22. Ground disturbing activities on or near a known archaeological study and the work itself will be monitored by an archaeologist. *If any resources are discovered, all work shall be halted until the City has contacted the property authorities and adequate mitigation measures are completed.* The purpose of this action is to preclude accidental damage to archaeological deposits in the Davis Planning Area."

PSU-1

Page 108, paragraph 2, sentence 2 under Levels of Significance in the Draft EIR is changed as follows:

"The provision of adequate resources to maintain current levels of service for the Parks and Recreation Department is ~~also an impact mitigated to a level of insignificance~~ *partially mitigated significant unavoidable impact.*

ES-1

Change #10, page 133 of the Draft EIR to read as follows:

"The Revised Open Space Element is inconsistent with portions of the *Yolo and Solano County General Plan and Zoning maps, and the UC Davis Long Range Development Plan.*"

APPENDIX A
WRITTEN RESPONSES

DOWNEY
BRAND
SEYMOUR
& ROHWER

ATTORNEYS

555 CAPITOL MALL
10TH FLOOR
SACRAMENTO, CA
95814-4686
TELEPHONE (916) 441-0131
TELECOPIER (916) 441-4021

STEPHEN W. DOWNEY
(1926-1959)

CLYDE H. BRAND
(1926-1964)

HARRY B. SEYMOUR
(1926-1977)

RECEIVED

JUN 11 1990

CITY OF DAVIS
PLANNING

KATHRYN J. TOBIAS

June 11, 1990

Michael Thiele, Planning Director
City of Davis
Planning Department
23 Russell Boulevard
Davis, California 95616

Re: Comments on the Draft Environmental Impact Report
for the Open Space Element

Dear Mr. Thiele:

On behalf of a number of property owners, we are forwarding the enclosed comments on the Draft Environmental Impact Report ("DEIR") for the Revised Open Space Element. A list of these property owners with assessor parcel numbers follows the comments. Finally, I have commented on the City's response to the Notice of Preparation comments. The total acreage owned or controlled by these landowners is approximately 8,425 acres. I have included some general statements at the beginning of the comments outlining broad problem areas, followed by detailed comments.

GENERAL STATEMENTS

1. Inadequate Number and Discussion of Alternatives. According to the California Environmental Quality Act ("CEQA") Guidelines ("Guidelines"), a DEIR must describe "a range of reasonable alternatives to the proposed project, or to its location, that could feasibly attain the project's basic objectives, and must evaluate the comparative merits of each alternative." (§ 15126(d).) This DEIR does not identify a range of reasonable alternatives.

a. Any alternative proposed in the DEIR must carry out the three objectives of the Open Space Element, namely: the creation of continuous public open space; the creation of Connector Greenways or links to connect open space areas; and the enhancement of native vegetation and wildlife habitat. An alternative of low density or clustered residential areas should have been analyzed. For example, the Greenway could be provided in conjunction with 1, 5 or

KT

10 acre ranchettes. Figure 3 in the City's 1987 General Plan in fact illustrates this very idea of how an agricultural buffer might be developed with different types of uses providing open space along with other types of uses for the property. Given that the City's General Plan anticipates this "mixed use," this alternative should have been included.

This mixed use alternative also demonstrates an alternate way of financing open space, by exacting open space in return for development rights. This alleviates the impact upon public funding and on the few property owners who are required to bear the burden of providing open space for the City as a whole.

The DEIR should also discuss an alternative means of paying for the greenbelt, other than outright purchase by the City such as purchase of open space easements and the transfer of development rights, which would allow both the City and the landowners some flexibility in accomplishing the City's Open Space Element objectives, should be analyzed. As we will discuss later, the lack of fiscal analysis is a serious omission, and has led to an inadequate alternatives analysis.

General Plan Policy 3.2F states that the City will "use all available mechanisms for preservation of open space." As we have pointed out above, many alternatives or "mechanisms" have been ignored, contrary to the City's own General Plan policies.

b. CEQA also suggests that an alternative location for the proposed project be described. There is no explanation in this EIR which indicates why the buffer is located in its proposed (and vague) location. If in fact it is an arbitrary location, then the Open Space Element and the EIR should so state.

Furthermore, there is no discussion of alternative locations for such a buffer. Natural open spaces and the use restricted area surrounding the Yolo County Landfill and the City sewage treatment plants might provide the possibility of open space, not only incorporating natural features into such a buffer but addressing areas with serious constraints for further development such as flooding or proximity to a noxious use.

c. The City's General Plan suggests in Policy 2.1C, that a creation of a new town may be an alternative to future growth for the City. This

KT-1b

KT-1c

alternative was also mentioned in the Notice of Preparation responses. Because the City cannot guarantee that land will be maintained in Agricultural Open Space or Agricultural Preserve without purchasing the property or the rights to the development of the property, the DEIR should include an alternative that addresses the creation of a new town along with the possibility that urban development will "leapfrog" over the Capitol Greenway. The Initial Study also suggests that an urbanization alternative will be discussed. This alternative appears to have been dropped between the Initial Study and the DEIR. This presents a source of confusion for the public who may have read the Initial Study and expected that the document would provide discussion of this alternative.

2. Inadequate Project Description. "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 193.)

a. The DEIR suffers from the fatal flaw of vague and ambiguous project description. It is impossible to determine what this document is being used to evaluate or approve. It is not clear whether the proposed designations listed in the Open Space Element are simply proposed for inclusion in the Open Space Element or whether these designations are actually being applied to property within the Davis Planning Area, in the nature of a rezoning. This same issue was raised by LAFCO and the County Administrator's Office. It remains unresolved.

There is no specificity with respect to the project. The Revised Open Space Element indicates that the Greenway will have an average width of 1,500 feet and a minimum width of 500 feet, and that the public access portion shall be 100 feet in width on average, but there is no information as to where and how these Greenway areas will be actually implemented. There is no ownership map that shows how an individual owner will be affected by the designation of such a Greenway and its proposed uses. The decisionmakers have no idea whether they have consigned all of a property owner's parcel or a small portion of the property to a Greenway. The 1987 General Plan shows the greenbelt/agriculture buffer as a schematic indication. It is not clear what, if anything, is being changed as a result of this revision. There is no indication of where public recreation areas, semi-public areas and buffer areas are actually going to be created. Many of

the activities which are indicated as appropriate for the Greenway on Page 8 of the EIR are activities which have environmental impacts, such as traffic and land use compatibility problems. Thus, the EIR is deficient for any kind of specific implementation unless it indicates at least generally where these different types of activities are proposed and what the impacts are on adjacent developed and non-developed areas.

By incrementally dealing with the issue of the Greenway, to wit, by indicating a greenbelt as a schematic indication in the General Plan, followed by this Greenway with proposed activities that have no precise project boundaries or location in this revised open space, the City is in the process of trying to achieve what is essentially a legitimate public purpose by illegitimate means. By distorting the project description and by incrementally approving policies relative to the Greenway, a property owner ultimately affected by the designation of a Greenway on his or her property has no opportunity to understand what the long-term impact is going to be.

b. In addition, the General Plan states in Policy 3.2D: "In order to allow efficient cultivation, pest control, and harvesting methods to be employed on agricultural land, those property owners wishing to develop [should be required] to provide a buffer or other means of mitigating the adverse effects of urban development on adjoining agricultural land." The Open Space Element and the EIR do not discuss why the buffer is being located on property that is not being proposed for development. In effect, the City has shifted the burden of providing a buffer between the agricultural areas and the urban development to the agricultural property owner. The property owners that are allowed to develop their property without addressing this need for a buffer will receive a "windfall", while the property owners who are now designated as permanent agriculture are "wiped out," to use planning jargon. Aside from violating General Plan policies, the City is setting up an inequitable situation among landowners. The EIR must discuss the impacts of changing this General Plan policy both physically and fiscally.

KT-2b

c. Based on the policies that are presented in the City's Land Use Element and the City's existing and Revised Open Space Element, it is clear that the revised designations are used as growth management tools as well as a way to meet the open space needs of the City. The DEIR completely ignores this aspect of the revised land use designations. The project

KT-2c

description must be revised to reflect the fact that the City does use these open space designations as growth management tools; the rest of the document needs to be revised in light of this revision to the project description.

3. **Inadequate Fiscal Analysis.** Although CEQA does not require analysis of economic or social change by itself, "a social economic change related to a physical change may be considered in determining whether the fiscal change is significant." (CEQA Guidelines, § 15064(f).)

Without the fiscal analysis showing how this buffer is to be acquired, it is impossible to determine whether significant effects may be present. For example, there is no indication of when the City might acquire property within the Greenway areas, much less where and how much Greenway property is going to be acquired. The City has no idea of how much of a person's property might be affected by the buffer. The City has no idea how agricultural infrastructure on a parcel might be affected, to wit, whether wells, drainage or irrigation infrastructure are located in the buffer which may engender substantial costs of replacement or relocation. Without knowing whether the City is able to purchase this property immediately or within ten or twenty years, the landowner is left in a very uncertain and precarious position. A property owner can not make a decision as to how to farm the property without knowing when and if this property will ever be purchased and used by the City.

Without a fiscal analysis showing the effect on physical environment, the EIR is inadequate on its face. In Citizens Association for Sensible Development of Bishop Area v. County of Inyo (1985) 172 Cal.App.3d 151, 169-170, the court noted that Section 15064(f) "expressly gives the agency discretion to determine whether the consequences of economic and social changes are significant, which is not the same as discretion to not consider these consequences at all." (Emphasis added.) The lack of fiscal analysis contributes to further problems with the project description, cumulative analysis, growth inducing analysis and alternatives analysis.

4. **Inadequate Discussion of Significant Impact Upon Agricultural Operations.** Although the detailed comments will cover this issue, it is important to indicate at the beginning, along with the other fatal flaws of the DEIR, that the document is totally

inadequate with respect to describing the significant adverse impacts upon farming operations surrounding the City.

First, because the project description is inadequate with respect to the exact property affected, no future plans can be made for any permanent installations related to agricultural uses, such as orchards, or drainage or irrigation systems.

Second, the EIR does not discuss the impacts of the active recreational uses on adjacent farming practices. Because the EIR and the Open Space Element fail to indicate where various activities will be located, a farmer has to assume the worst case scenario that a campground or active recreational uses attracting large numbers of people will be placed on or near his or her property.

The DEIR does not discuss what effect these activities have on farming with respect to specific crops. The DEIR doesn't indicate whether aerial spraying will still be possible, what the effects of active recreational uses are on agricultural operations, and most importantly, the document does not deal with the landowner's liability for these active recreational uses. There is no discussion as to how people will be restricted from entering agricultural property.

DETAILED COMMENTS

5. Pages vii-xi: The Project Summary is inadequate on its face. Section 15123(b) of the Guidelines states that: "The summary shall identify: (1) Each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect" The DEIR Summary has merely taken the closing paragraphs from each section of the document and folded them into the DEIR without describing the proposed mitigation measures. In addition, the Guidelines require that the summary identify the alternatives that would reduce or avoid that effect. The DEIR Summary merely lists the alternatives without identifying why or how the alternatives would reduce or avoid the significant effects.

KT-5

6. Page xi: Section 15123 of the CEQA Guidelines also requires that the summary identify the areas of controversy which are known to the lead

KT-6

agency. The areas of controversy listed on Page xi do not include the significant impact on farming operations. The DEIR also fails to identify the impact on the region due to the limitation of growth that will occur as a result of adopting these open space designations. These impacts include the effect on fair share housing, the impact upon providing housing for people who work in Davis, and the effects on traffic and air quality due to the jobs/housing imbalance.

7. Page ix: The summary of the Population and Housing sections identifies a significant cumulative impact. Contrary to Guidelines Section 15123, there is no proposed mitigation measure listed nor is an alternative identified which would reduce or avoid that effect. On Page x, the same problem exists with respect to the identification of the cumulative impact of development and disturbance on cultural resources.

8. Page x: The DEIR Summary identifies an insignificant impact related to the provision of public services and utilities. Because the Greenway is not site-specific and because specific activities are not described, the EIR cannot state with any certainty that the impacts are insignificant.

In the second paragraph of that section, the EIR indicates that significant impacts are mitigated to a level of insignificance by providing access for fire and police departments, and provision of adequate resources to maintain current levels of service for the Parks and Recreation Department. Based on the Sundstrom case, these mitigation measures are not legally adequate without some standard set for emergency access or current levels of service. (Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296.)

9. Page 1: The fiscal analysis is an integral part of the EIR. As we mentioned above, the document is inadequate without the fiscal analysis. Several references are made in the DEIR to the fiscal analysis, leading the reader to assume that the fiscal information is integral to the rest of the analysis.

The EIR must be recirculated once the fiscal analysis has been provided. The CEQA Guidelines indicate that a complete and adequate DEIR is just as important for the public as it is for the decisionmakers. The CEQA Guidelines state in Section 15201 that "public participation is an essential part of the CEQA process." There are six separate policy

grounds which justify the requirement that lead agencies must seek and respond to public comments:

- (a) "Sharing expertise";
- (b) "Disclosing agency analysis";
- (c) "Checking for accuracy:"
- (d) "Detecting omissions";
- (e) "Discovering public concerns"; and
- (f) "Soliciting counter-proposals".

CEQA Guidelines, § 15200.

The certifications of the EIR without recirculation also denies other responsible agencies and trustee agencies review of the fiscal analysis. Public Resources Code Section 21092.1 states that "when significant new information is added to an environmental impact report after notice has been given . . . and consultation has occurred . . . , but prior to certification, public agency shall give notice again . . . and consult again . . . before certifying the environmental impact report." This same provision would also apply to the provision of any additional alternatives or mitigation measures for any part of the document.

10. Page 1: Although it is difficult to tell the difference between a "tiered" document as compared to a program EIR, this document may not be appropriate as a tiered EIR. Under Guidelines Section 15152, the Discussion indicates that "the tiering concept . . . is designed to promote efficiency in the process and to improve consistency or compatibility of the CEQA process with the NEPA process."

This section of the DEIR is not very helpful to the DEIR reviewer. Several sentences in this section appear to be taken directly from the Guidelines Discussion under Section 15152. The discussion not taken from the Guidelines is so general as to be almost useless in understanding how the tiering is to work, what action is actually being approved under this DEIR and in fact what actions will be covered by further environmental documents.

11. Pages 5-9: The revised designations that are being approved as a part of this project description

KT-9

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KT-11

are listed as revisions to the current Open Space Element. However, these are not merely revisions but substantial changes to the current designations within the existing Open Space Element. The text on Page 76 indicates that the "Revised Open Space Element represents a substantial reworking . . . of [the] designations . . . and policies." These new designations include an Agricultural Preserve, introducing the idea of a permanent buffer between adjacent jurisdictions to maintain separate identities of surrounding cities. The Revised Element also includes a new designation of Agricultural Open Space, indicating that it is to be used not only during but beyond the 23-year planning period. There is no discussion of the justification for extending the designation beyond the planning period, nor is this anticipated in the existing Open Space Element.

On the 1987 General Plan, a greenbelt/agricultural buffer is indicated as a schematic indication. The designation of the Davis Greenway proposes a much grander idea of what activities would occur in such a buffer. However, the DEIR does not address how the Greenway moves from schematic designation to implementation without identifying specific plans for Greenway activities.

12. Page 9: The document states that "financing is available for some components of the Open Space Element," including allocations for the purchase and development of the Davis greenbelt. However, since there is no indication of how much land is going to be acquired nor what activities are proposed as a part of the Davis greenbelt, it seems unlikely the authors of the DEIR would know that financing would indeed be available.

13. Exhibit 3: This exhibit showing the Davis Open Space Element map was virtually unreadable in our copy of the DEIR. As such, it provides no notice to landowners who might be affected by the proposal of the Davis greenbelt. A detailed map showing the proposed greenbelt boundaries compared to existing ownership should be provided as a part of the DEIR.

14. Page 12: There are typographical errors in the paragraph under Conservation Element, 6.2.J. Adjacent is spelled incorrectly in the first line, as is compatible in the fourth line.

15. Page 13: Under Required Discretionary Actions, number 4, an amendment to the South Davis

Specific Plan Map will be made. This map needs to be included as part of the document. It is impossible to tell what is being amended. The amendment needs to be described or referenced.

16. Page 13: Under Project History, the DEIR indicates that the City directed staff to prepare a revised Open Space Element which incorporates the existing document policies and a map to reflect the "greenway concept." What is not clear throughout the revised Open Space Element and the DEIR is what is actually being incorporated or revised. It is unclear whether the proposed Greenway is still at a conceptual level, as may be indicated by the fact that there is no site-specific map for the Greenway and the fact that the activities that are proposed for the Greenway have not been designated in any particular area. However, if the revised Open Space Element and DEIR are actually going to be used to amend the General Plan Map and designate land as open space or Greenway, agriculture preserve, or agricultural open space, then this DEIR is inadequate because it is not specific.

KT-16

17. Page 18: Although the document states that the City operates 31 parks, there is no map that indicates what is already provided by the City. There is no map in the 1987 General Plan. A map should be provided.

KT-17

18. Page 18: Pending development projects are listed on Table B and some of them are shown on Exhibit 5. However, the document does not indicate how many of these projects are situated on prime agricultural land. Because the City is using the justification of preserving prime agricultural land in this document, the public should be apprised as to how well the City is currently carrying out its policies in the existing General Plan as to prohibition of development projects on prime agricultural land.

KT-18

19. Page 27: The information contained with respect to the West Area Pond and the Stonegate project is very old. This information should be updated.

KT-19

20. Page 28: As indicated above in the general comments, the discussion of impacts upon agriculture and agricultural operations is completely inadequate. Although the crops generally grown in the area are included on a table, there is no attempt to indicate where in the County these crops are grown, what kind of farming practices are associated with these crops, and whether certain crops are more impacted or less

KT-20

impacted by the provision of a 1,500 foot greenbelt buffer where the public is engaged in active and passive recreational uses. The need for this information was specifically requested in comments to the Notice of Preparation (NOP) by several reviewers.

21. Page 28, third paragraph: Statistics should be provided on the number of Williamson Act contracts that have not been renewed in the last ten years in the area covered by the Davis Planning Area.

KT-21

22. Page 28, first full paragraph: There is perhaps a typographical error in the second-to-last line, pertaining to ad hoc or ag hoc.

KT-22

23. Page 28, fourth paragraph: Exhibit 8 is not included in the copy of the DEIR that we received.

KT-23

24. Page 28, last paragraph: The last sentence of that paragraph indicates that "some areas adjacent to the City of Davis are designated with this soil type." We request that a map showing where the farmland of state-wide importance is located adjacent to the City of Davis, and in the Davis Planning Area.

KT-24

25. Page 33, third paragraph: The DEIR indicates land that has been placed in agricultural preserves to discourage premature and unnecessary conversion of such lands to urban uses. It is important to indicate that this is only one of five goals indicated under the Land Conservation Act.

KT-25

26. Page 33, fourth paragraph: Exhibit 8 is again referenced. We did not receive a copy of that map.

KT-26

27. Page 33, last paragraph: Throughout the discussion of significant impacts under Land Use, the DEIR concentrates on the loss of prime agricultural land or the impairment of agricultural productivity. However, there is virtually no discussion of the impact upon agriculture, agricultural practices, agricultural infrastructure, land holdings, ownership patterns, or how long the City expects that agriculture will stay in agricultural uses. It also does not address the impacts on other jurisdictions in the area as a result of foreclosing development in the 84 square miles surrounding the City of Davis. For example, the City of Fairfield and the City of Vacaville are presently discussing a greenbelt between their two cities. If every city in the region adopts a similar buffer, and then indicates in the General Plan that the land beyond

KT-27

the buffer is in permanent agriculture, the regional cumulative effects of such actions will be substantial, to say the least. The inadequacy of the impact analysis here is again partially due to the fact that the project description is inadequate due to the fact that these policies are actually growth management tools as well as open space policies, and thus the cumulative and growth-inducing impacts, particularly region-wide, are severely understated.

28. Page 34, first paragraph: The uses which are indicated for the greenbelt are generally inconsistent with maintaining land in agriculturally productive uses. Active recreation areas, active recreational pursuits such as biking, jogging, hiking, etc., are generally not compatible with the agricultural practices that are followed by most of the farmers in this area. If, however, traditional agriculture is going to be changed over the life of this General Plan to uses such as community gardens, urban forests, etc., then this impact must be discussed as to whether these are really feasible uses for this area, including the impacts on large scale agricultural operations.

KT-28

29. Page 37: There should be an overall total to the number of acres converted.

KT-29

30. Page 40, first full paragraph: In one of the few references to the impact of public access and human activity near adjacent agriculture, the impact is dismissed by unspecified mitigation measures. Since there is no indication that the authors of the EIR have any idea of what public access and human activity will occur next to what type of agriculture, it is difficult to understand how the issue is mitigated to a level of insignificance. There is a passing mention of trespassing. There is no discussion of how the landowner is to deal with the liability of people engaged in active recreation adjacent to their property. It also does not deal with the liability due to the application of pesticides or fertilizers, irrigation hazards or equipment hazards. This needs to be fully explored. The impact on agriculture is significant and as such, must be mitigated to a level of insignificance or a statement of overriding considerations made. (Guidelines, § 15092.)

KT-30

31. Page 40, last paragraph: The last sentence is based at best on speculation. How was the impact determined when there is no plan for the actual uses to be contained in the Greenway area? This sentence should be stricken from the document. We assert that

KT-31

the impact of the Davis Greenway on continued agricultural use is a significant impact with no mitigation measures contained in this document.

32. Page 41, second paragraph: Again, there is reference to an impact being minimized by the fact that certain types of activities will be allowed. This is impossible to determine, because there is no plan. This sentence should be stricken.

33. Page 41, last paragraph: This is one of the few references to impacts upon agricultural operations. However, instead of describing in some specificity how agricultural operations might be impacted, the DEIR goes on to state that this concern will be reduced with the buffer and the continuation of agricultural uses on the other side of urban development. First of all, this is not a mitigation measure, since there is no description as to how wide the buffer is going to be and what the impacts are going to be on agriculture operations. Second, this is in direct contradiction of a specific General Plan policy, which states that the property owners who wish to develop are to provide the buffer or other means of mitigating the adverse impacts of urban development on adjoining agricultural land (Davis General Plan, p. 3-2). There is no reason that the owners of agricultural land should be required to bear the brunt of mitigating an impact that is caused by urban development. Furthermore, most of the EIRs that have been approved for recent residential development on the periphery of the City have indicated that the buffer is to be borne by the developing property, not the adjacent agricultural area. The document goes on to state that "this is considered as a mitigation measure in the following sections." This is a totally inadequate mitigation measure and as such may not be used to mitigate any of the significant impacts identified in the DEIR.

34. Page 42, fifth full paragraph: Although it is indicated that the majority of the land is under Williamson Act contracts, a search of the records of Yolo County should be made to see whether notices of nonrenewal have been filed on any of this property. The number of acres in agricultural preserve should be shown. The impact on growth patterns in this area should also be discussed. There is virtually no analysis contained in this section, which minimizes the fact that the City is in effect rezoning this area to permanent agriculture.

35. Page 43: The discussion of cumulative impacts is totally deficient. There is no discussion on the impact on regional growth. Due to the fact that the City of Davis is in effect rezoning 84 square miles into uses other than urban development, the impact of such a restriction must be analyzed not only with respect to the Cities of Woodland and Winters and the rural area of Solano County, but also on the cities of Fairfield, Vacaville, Dixon, West Sacramento and the City of Sacramento. If every city in the region decides to surround itself with a moat, then the cumulative impacts of where people are supposed to live and how issues such as affordable housing, jobs/housing balance and fair share housing must be discussed in this document.

KT-35

If Dixon and Woodland and Sacramento are going to be required to supply workers to Davis because the City desires to maintain its small-town character but fails to provide housing for these workers, then the impacts upon these other areas must be analyzed.

36. Page 45, Mitigation Measures: The mitigation measures proposed for the significant environmental impacts in this document are generally inadequate. In addition, there is no mitigation monitoring program included for public review.

a. With respect to the first mitigation measure, tiered environmental documentation is not a mitigation measure. Tiered documentation is allowed under CEQA to assist in environmental review. It is not a mitigation measure.

KT-36a

b. The second sentence under the first mitigation measure indicates that future monitoring programs are going to be used to analyze the impact of the proposal on existing land uses and resources. Under the Sundstrom case, future monitoring programs would be inadequate for this purpose.

KT-36b

c. Under the tiered environmental documentation measure, the consultants indicate that the mitigation of incompatibility between residential uses and existing agricultural uses will be evaluated, assumedly in the future. This evaluation will consider the use of buffer areas, spray easements, and other means of restricting aerial spraying. Again, this mitigation measure is inadequate for two reasons. A mitigation measure cannot be projected into the future without standards to insure that significant impacts are actually mitigated. In addition, because the document

KT-36c

ignores the significant impacts of this proposal on agricultural operations, this mitigation measure has its own significant effects, and as such under Section 15126(c), a mitigation measure that would cause significant effects in addition to those caused by the project must be discussed.

37. Page 45, second mitigation measure: This is not an adequate mitigation measure. First of all, the actual amount and extent of trespassing has not been adequately documented. Second of all, because the document does not show what crops are grown in what areas, and what activities are proposed in what areas, it is impossible to say whether the City can even "ensure" that trespassing will be minimized through any means. Third, signage, access restriction, and fines are not even discussed in the document. There is no documentation as to whether these are feasible mitigation measures or whether they will actually deal with the landowners' liability.

38. Page 45, third mitigation measure: The consultants indicate that development on non-prime soils will minimize the loss of prime agricultural land. The document does not indicate where this development could occur with any specificity. How many acres of non-prime soils are adjacent to the City? If there is non-prime soil that is available for development, where is it and is the City going to redesignate it as appropriate for urban development, based on this mitigation measure? Development on any type of soil has environmental effects. Again, a mitigation measure with potentially adverse impacts must discuss those impacts.

Creation of a new town is proposed as a mitigation measure, albeit very speculative. This measure also has significant impacts which must be analyzed. Removing this concept as a mitigation measure, as the Planning Commission suggested, is not possible because the General Plan suggests that a satellite city will in fact be considered by the City. The creation of a new town should not have been included as a mitigation measure but as an alternative and analyzed as such. If the satellite city is retained in the DEIR, then at the very least, the significant impacts associated with this mitigation measure must be analyzed.

Finally, the establishment of the Greenway as an urban-rural boundary as a mitigation measure is questionable. There needs to be some explanation as to

how this would act as a mitigation measure and what impact it is addressing.

39. Pages 45 and 46, Level of Significance: We disagree with virtually all of the findings of significance in this section. The open space designations are significant impacts. The project specific impacts related to pesticide use have not even been discussed, much less mitigated to a level of insignificance. Potential trespassing impacts are barely mentioned, much less mitigated. Significant cumulative impacts were inadequately discussed in the document; how does this "partially" mitigate the impact by prioritizing development? Cumulative effects cannot be reduced to a level of insignificance. This section must be revised to reflect these comments.

KT-39

40. Page 47, Land Use Plans: The Open Space Element designations are being used by the City of Davis as growth management tools in addition to meeting open space goals. Thus, it is necessary to discuss the growth management strategies from the other jurisdictions that surround the City of Davis. If each jurisdiction incrementally handles its growth management in a way that the provision of housing and jobs is skewed or ignored throughout the region, then the cumulative and growth-inducing impacts will be skewed or ignored as well. It is incumbent upon every jurisdiction, including the City of Davis, to deal with the regional impacts. Thus, this whole section is inadequate and must be revised.

KT-40

41. Page 56, County of Yolo General Plan: The document indicates that the Yolo County General Plan was adopted in 1983. It would be helpful to know the timeframe of the County's General Plan. In addition, the second line on page 56 indicates that the County is situated immediately west of Sacramento Valley. This is probably intended to mean Sacramento County. It should be revised.

KT-41

42. Page 59, County of Solano General Plan: This section indicates that the Solano County General Plan was adopted in 1980, with a timeframe to 1995. There is no mention made whether this plan is currently being revised. If it is, whatever progress has been made as to policies should be included in this document. In addition, the cities of Vacaville and Fairfield are also in the process of updating their General Plans. Since the cities are considering policies with respect to greenbelts and other growth management strategies,

KT-42

discussion should be included here, again with reference to regional impacts.

43. Exhibit 12, following page 61: Although there are designations on the map indicated as CS and CH, these are not mentioned in the legend. The legend should be revised. KT-4

44. Page 63, first full paragraph: This paragraph indicates that much of the lands are governed by Williamson Act contracts. Any recent withdrawals or notices of nonrenewal should be noted here. KT-

45. Page 72, Land Use Compatibility, West Davis: This section stipulates that a minimum distance between residential land uses and agricultural operations using Class 1 pesticides is 500 feet. The issue is who is going to provide that buffer: those allowed to develop or those who are required to stay in agricultural production? This issue must be discussed. KT-

46. Page 76, Open Space Element: At this point in the document, the DEIR asserts that the Revised Open Space Element contains a "significant reworking" of the open space designations contained in the General Plan. It still does not indicate whether these are conceptual designations that will be adopted for specific parcels in the future or whether these land use designations are to be applied to specific property at this time. The rest of this paragraph is nonsensical. The DEIR asserts that "the proposed adoption of the Revised Open Space Element is considered a land use plan impact." It then goes on to indicate that this impact can be mitigated by the adoption of the Revised Open Space Element, which seems to indicate that an impact can be mitigated by an adoption of the impact. This should be stricken from the DEIR. The policies within the Revised Open Space Element cause impacts. The EIR determines whether these impacts are significant or insignificant. Mitigation measures are then adopted to mitigate the significant impacts. It doesn't make sense to call a plan an impact and then mitigate it by adoption of that same plan. KT-

47. Page 80, Discussion of Open Space Impacts in the City of Dixon and Woodland: This analysis is entirely inadequate. What should be analyzed here is to what extent the cities of Dixon, Woodland and Winters contain policies which will provide or add to the open space provided by the City of Davis, so that the decisionmakers in the City of Davis can understand what they are adding in the regional context. Ki-

Furthermore, it should also indicate whether the cities of Dixon, Winters and Woodland, in addition to the cities of Vacaville and Fairfield are adopting open space designations or restrictions, which will in the future change growth patterns in the region. Further, the fact that the City of Winters, with its substantial potential for development, is not discussed severely underestimates the cumulative impacts in this section.

48. Page 82, Level of Significance: Because the EIR document has ignored the regional impacts of the use of open space as a growth management tool, there is no mention of significant regional impacts. In the second paragraph of this section, which indicates that land use incompatibility impacts between the greenbelt and increased human activity can be mitigated to a level of insignificance, we fully and totally disagree. The mitigation measures in the land use section are completely inadequate, as we have pointed out, and thus will not serve to mitigate the impacts mentioned in this section. Because the discussion of the impact of pesticide spraying is completely inadequate, it is impossible to say that the impacts are mitigated. The fact that no cumulative land use plan impacts have been identified is because the impacts on regional land use planning have been completely ignored in this document. Cumulative land use impacts must be addressed in this document. This section must be revised.

KT-48

49. Page 84, City of Davis: The third paragraph, discussing employment, fails to discuss how many people working in Davis are not able to live in Davis. It does not indicate where in fact the majority of people who are working in Davis live and where they are commuting from. By omitting this information, the impact analysis is inadequate. It should be revised.

KT-49

50. Page 85, Yolo County: The second paragraph on page 85 has the same flaw as in the previous comment: there is no discussion of cross-commute or where workers live and where they work. This problem continues on through the discussion of Solano County on this page.

KT-50

51. Page 86, Cumulative Impacts: The DEIR makes the statement that "in combination with other past, present, reasonably foreseeable projects in the region that restrict growth, plan population growth may be limited." However, this growth may not be limited but it may be accommodated elsewhere, such as in the cities of Winters, Woodland, Dixon, etc. This is not

KT-51

discussed whatsoever. This is a significant impact and must be addressed

52. Page 87, Level of Significance: The population impacts are inadequately discussed, and thus substantially underestimated. Furthermore, although this section does indicate that there is a significant cumulative impact, the discussion under cumulative impacts is totally inadequate. It is not sufficient to simply list the impacts. Section 15130 of the CEQA Guidelines states that there must be a "reasonable analysis of the cumulative impacts An EIR shall examine reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project." The document utterly fails at this task and must be revised.

53. Page 91, Housing, City of Davis: The third full paragraph discusses a median income and sales prices of homes. However, it does not follow with the customary analysis, which would indicate how many people who work in Davis can actually live there. This needs to be discussed.

54. Pages 88-99: The DEIR fail to discuss regional fair share of housing at all. Further, the cities of Winters and Woodland are not discussed with respect to their housing situation. Although the impact section does discuss the number of units that would not be built as a result of the policies in the Open Space Element, it does not discuss what the impact is on the region due to the units not being built. It also fails to discuss, as with the population section, the cumulative impacts on the rest of the region.

55. Page 99, first full paragraph: The document mentions the approval of the Mace Ranch subdivision. This indicates that in fact residential subdivisions can be approved on prime agricultural land and therefore brings into question whether the City will in fact approve development on prime agricultural land in the future.

56. Page 99, Cumulative Impacts: This is an inadequate discussion of cumulative impacts, per Section 15130(b)(3) as mentioned above.

57. Page 99, Mitigation Measures: The loss of potential housing might be mitigated by an alternative which allowed for housing units provided in either a clustered or a ranchette growth pattern. This needs to be discussed in the alternative section and here.

58. Page 99, Level of Significance: Because the analysis in this section failed to discuss the regional fair share problem, the finding of insignificance here is in question.

KT-58

59. Page 114, Public Services and Utilities: This section is of little use without the specific discussion of the types of activities which are going to occur in the greenbelt. Although sufficient for a conceptual document, it is not sufficient for any specific designation to any specific property.

KT-59

60. Page 117, Cumulative Impacts: This analysis is inadequate, given the lack of information concerning activities in the greenbelt.

KT-60

61. Page 117, Mitigation Measures: This mitigation measure is legally inadequate. Without a standard to measure the level of service for fire, police, parks and recreation, and public works departments, this mitigation measure suffers from a Sundstrom problem and is therefore not available to mitigate any impacts.

KT-61

62. Page 118, Level of Significance: We assert that the impacts of the project must be found significant until there is sufficient information with regard to the types of activities which are going to occur and the appropriate mitigation measures. With respect to the "tiering" or programmatic nature of this document, the services will have to be evaluated in an environmental document for any specific activity. The treatment in this section will not be sufficient to base an initial study or negative declaration on the information contained herein.

KT-62

63. Page 119, No Project Alternative, Environmental Assessment: The no project alternative is an integral part of environmental impact reports. Section 15126(d)(2) states that "the specific alternative of 'no project' shall also be evaluated along with the impact." Notice that the language says that the alternative of no project shall be evaluated along with the impact. In the recent Supreme Court decision of Laurel Heights Improvement Association of San Francisco v. The Regents of the University of California (1988) 47 Cal.3d 376, the Court indicated that the EIR should explain in detail why various alternatives are deemed infeasible. Here, the alternative is dismissed in one paragraph by saying that the alternative is inconsistent with the current

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City of Davis General Plan and does not meet the objectives of the proposed Open Space Element. This is inadequate discussion. The recent case, Citizens of Goleta Valley v. Board of Supervisors (Goleta II) (1989) 214 Cal.App.3d 174, indicates that alternatives not consistent with the General Plan requiring a change in the zoning ordinance may not be summarily rejected. Although the Goleta II decision is currently under review by the California Supreme Court, it is important to understand that both the Laurel Heights and Goleta II courts emphasize the importance of disclosing agency analysis to the public, so that the public was not forced to accept a stated conclusion at face value. Therefore, this analysis should be substantially revised.

64. Page 120, Development Under the Existing General Plan, Land Use: The discussion states that the primary impact to land use is the conversion of prime agricultural lands. As we mentioned earlier, we believe that the other significant land use impact is the impact of recreational activities within the Greenway on adjacent agricultural uses. This should be added to this section and discussed.

65. Page 120, Development Under the Existing General Plan: This whole section suffers from the fact that the project description is vague and ambiguous. If the regional fair share had been discussed in the housing section, if the impact upon the population commuting to other areas or commuting to Davis from other areas based on the lack of housing and the provision of jobs in the area had been discussed, then this alternative might appear more attractive. This section should be revised to reflect the comments made in this letter.

66. Page 123, Alternative Location: This discussion analyzes only the nature reserve/wildlife habitat/wetlands component. As mentioned at the beginning of this letter, the Greenway designation should also be considered in an alternative location, such as one to the north which would encompass areas of natural interest, such as the Willow Slough and the use restriction area surrounding the waste disposal, landfill, and sewage treatment plant area.

67. Page 123, Design Alternative: In addition to this alternative, as mentioned at the beginning of the letter, an alternative should be considered which accomplishes the objectives listed in the Revised Open Space Element but allows some further use by the

property owner. These uses might include the possibility of five or ten or twenty acre ranchettes, clustered housing, or intensive uses that could be clustered, while maintaining open space, such as shown on Figure 3 in the 1987 General Plan.

68. Page 126, Long Term Implications of the Proposed Project: This discussion is necessarily incomplete, based on the lack of specificity in the project description. Each of these areas will have to be revisited when specific projects are considered by the legislative body.

KT-68

69. Page 128, Inventory of Impacts Found to Be Insignificant: Again, the adequacy of this section will have to be measured by what it is that the legislative body is approving. If the City is adopting General Plan designations in a conceptual manner, without relationship to individual pieces of property, then the initial study may or may not be adequate. However, if this Greenway is to be applied to individual pieces of property, with the effect of rezoning, then this initial study is completely inadequate.

KT-69

70. Page 129, Environmental Impact Report: The characterization of the significance levels under land use plans, population, and housing is inadequate, based on the above comments.

KT-70

71. Page 130, Inventory of Impacts that Require Tiered Analysis: Given the ambiguity of the Revised Open Space Element in this DEIR, we believe that any specific plan for the greenbelt area will require project-specific environmental analysis. This will include the areas of land use and compatibility with land use plans, population, housing, noise, air quality and noise with respect to traffic increases, the rate of use of any natural resources, emergency response plans, additional vehicular movement, existing transportation systems, obstruction of scenic views, etc.

KT-71

72. Page 132, Inventory of Impacts Mitigated to a Level of Insignificance: The comments above indicated that the impact of pesticide spraying and trespassing cannot be listed as insignificant. The rest of this land use impact summary is of very little use to the document. The listing of fire and police services and adequate resources for parks and recreation as an

KT-72

insignificant impact, as we mentioned above, is inadequate.

73. Page 134, Inventory of Significant Unavoidable Adverse Impacts: Under land use, we would include land use compatibility between agricultural operations and active recreational uses as a significant unavoidable impacts that cannot be mitigated. The statements on land use plans, population, and housing needs to be substantially revised to consider the growth management ramifications of these policies and the impact accommodating fair share housing.

74. Page 135, Inventory of Mitigation Measures: As mentioned above, all of these mitigation measures are legally inadequate and need to be substantially revised. On page 137, the review by these departments of projects to insure the existence of proper mitigation measures is a legally inadequate mitigation measure under the Sundstrom case. The same comment stands for fire services, police services, parks and recreation, and public works department.

75. Page 27, Initial Study, Attachment B Alternatives: The Initial Study indicates that an alternative of urbanization was to be analyzed in the EIR. The expectation created by the inclusion of this alternative further supports the contention that this alternative should be analyzed and the EIR be recirculated.

76. Notice of Preparation: According to the Notice of Preparation (NOP) announcement, the NOP was prepared on February 16, 1990. Comments were received between March 15, 1990 and March 26, 1990. It was published on April 26, 1990. Given the need for time to print the document, the EIR was either prepared in three weeks, or the EIR was started prior to receiving the comments generated by the Notice of Preparation. While CEQA does not require that work on the DEIR to await responses to the Notice of Preparation, the Guidelines do indicate that the DEIR may need to be revised or expanded to conform to responses to the Notice of Preparation. (CEQA Guidelines, § 15082(a)(4).) The fact that many of the responses to the Notice of Preparation echo the concerns raised in this letter, it appears that the DEIR was not revised to reflect the comments to the Notice of Preparation. In fact, upon reviewing the responses to the Notice of Preparation and the response to comments contained following those in the DEIR, it appears that the NOP

comments were not addressed in the DEIR; the response to the NOP comments in the back of the DEIR are little more than a "brush off." Most of the responses to those NOP letters consist of referring the reviewer to a certain section, or postponing the issue to a later date. In most cases, this is a totally inadequate response.

If it was the intent of the City to address the additional responses from the Notice of Preparation in the Final EIR, this again supports the contention that the information must go back to the Planning Commission prior to consideration by the legislative body. The document needs to be substantially revised and recirculated. We have discussed specific NOP comments below with the inadequate responses.

a. Department of Conservation: DOC - 4. The Department of Conservation requested information on farmland conversion impacts, including the type, amount and location of farmland conversion, the impact on current and future agricultural operations and the cumulative impact of the project on farmland and the project in surrounding areas. This is very similar to the information requested in this comment letter. The response from the City is simply to refer the reader to the land use section. As mentioned, there is no specific discussion of the actual crops grown in the area impacted by the Greenway. Given that this information was requested at the NOP stage, it should have been contained in the DEIR.

KT-76

b. Yolo County, Department of Public Works and Transportation. Mr. Robertson has requested information on the effects of wetlands on adjacent farmlands, mentioned drainage problem, indicates that the establishment of wetlands will cause groundwater to rise closer to the surface of the County landfill, and questioned whether the creation of wetlands would have an effect on the location of certain county roads. These comments have essentially been dismissed as being analyzed in the future. However, CEQA requires the impacts that are identified be analyzed, even if at a very general level. Certainly, there is an indication of what impact the wetlands may have on drainage in the area, whether groundwater may rise, and whether certain roads will have to be moved. This is a totally inadequate response to this NOP comment.

KT-76

c. Yolo County, Betsy Marchand, Fourth District Supervisor. Supervisor Marchand has asked that the amount of potential revenue loss resulting from the

KT-76-

reduction of agricultural productivity be described, asked questions about water and asked specifically how the land is to be secured for the open space uses, how landowners will know that their land is to be impacted and whether the City plans on annexing this property. The response is to state that the answer to her comments is to be contained in the fiscal analysis. The fiscal analysis was not distributed with the DEIR. The rest of the City's response postpones comment to a later time or refers the reviewer to later studies. It is not legally sufficient to notify landowners of a General Plan designation by means of a public hearing only, as the City's response attempts to do.

d. Yolo County, Department of Public Health. Mr. To has requested information with regard to the mosquito problem, the fact that the bypass is utilized as a disposal channel and the effects of selenium in the Yolo Bypass. These comments are dismissed by reference to future environmental documentation and forwarding the comments to the appropriate decisionmakers. The appropriate decisionmaker is not named. Again, CEQA requires that impacts be addressed, even if they are at a very general level. The fact that the City intends to designate open space wetlands that may have a substantial effect on mosquito breeding near an urban area could be treated generally in a draft environmental impact report.

e. Yolo County Local Agency Formation Commission (LAFCO). LAFCO has requested information similar to what has been requested in this comment letter. They have asked whether the City intends to annex the property, whether there is a timeline, and how the City is going to impose these expectations on the County and unincorporated landowners. LAFCO also asks for alternatives. LAFCO also points out that the loss of prime agricultural lands may impact the revenues received by the County which may result in lowering of service levels for County services. The response to the NOP comment refers the reader to the land use section. However, the land use section does not address any of these comments specifically. Although the comment does indicate that the City of Davis does not intend to annex property, it does not indicate how it intends to enforce the designation of the Greenway.

f. County of Yolo, Office of the County Administrator. These comments are substantially similar to those presented in this comment letter, especially with respect to the confusion over the project description, the issue of enforcement of the

City's General Plan in unincorporated areas, the need for fiscal analysis, etc. However, in a clear display of inadequacy, the response to these NOP comments dismisses the comments as "comment noted," refers the reader to the project description section, and generally continues to dismiss most of the concerns in a cursory manner.

g. Deering Design. Again, Mr. Deering has raised similar issues with respect to the need for showing an alternative which incorporates the satellite community plan which is contained in the City's General Plan. The response is to dismisses the satellite community plan as remote and speculative. However, the EIR also contains the satellite community plan as a mitigation measure. The City cannot have it both ways. If it is too remote and speculative to address as an alternative, it certainly is too remote and speculative to be addressed as a mitigation measure. However, as we mentioned above, the satellite city idea must at least be addressed to the extent that it is contained in the City's General Plan as an alternative.

KT-76i

h. Cunningham Engineering. Mr. Cunningham points out that the existence of a greenbelt would preclude the logical and adjacent future extension of urban development. As he notes, no cities have been able to permanently preclude new development on its borders. An alternative to the attempt to limit growth needs to be discussed in this EIR, unless the City is willing to buy the development rights of the farmland in this area. Otherwise, there is really no other way to permanently keep this area in agriculture. Future growth will jump the greenbelt and that there will be impacts on public utilities, air and traffic impacts, land use compatibility impacts, etc. The response to Mr. Cunningham's comments are again cursory and inadequate.

KT-76i

i. Sutter Davis Hospital. Mr. Brady raises the issue of whether the proposed greenbelt will preclude the hospital's ability to develop their site which is located in the proposed greenbelt. The response to comments indicates that the Davis greenbelt will go around the hospital site. However, there is no discussion in the EIR that indicates why the Davis greenbelt is going to go around the hospital site.

KT-76i

Does this mean that there are certain uses that will be
allowed to develop that are currently outside the City
limits?

Respectfully submitted,

Kathryn J. Tobias

KATHRYN J. TOBIAS

Enclosure

LANDOWNERS INCLUDED IN
COMMENT LETTER ON DEIR

Fred C. Heidrick Family Trust	42-110-11
Fred Heidrick, Trustee	42-110-12
	42-110-13
	42-090-07
	42-120-09
	33-130-30
	33-130-04
	40-170-09
	40-200-11
	40-200-14
Joe A. Heidrick Family Trust	40-140-14
Edith Heidrick, Trustee	42-120-05
	42-120-04
	42-120-07
	42-120-06
Rancho 102, a partnership	42-070-09
Robert Eoff & Fred Heidrick, Jr.	33-300-15
Schultz Investment Co.	33-290-07
	33-300-01
Barbara Bruner	33-290-59
Bess Leland	33-290-011
	33-290-581
	33-290-041
Kern Chew	33-290-63
	33-110-46
	42-130-12
	42-130-17
Chester Roth & Bill Roth	40-170-10
	37-040-01
	37-040-05
Mariani Nut Co.	32-240-07
	32-120-13
	32-120-12
E & J Farms, Inc.	41-050-05
	41-100-20
Margaret Koontz & Lorraine Kerr	41-100-04

William Stephens, Thomas Stephens
and Florence Stephens Estate

41-110-05
41-110-07

Mr. & Mrs. Loren LeMaitre

41-060-11

John Meek

41-060-01
41-060-03
41-100-08

Laverne Oeste Trust

36-010-03

8,425 acres

KJT90188
06/11/90

Hamel Ranch Partnership
Hamel-Rust Properties
Route 1, Box 1015
Davis, CA 95616

11 June 1990

Bill Allayaud
Community Development Department
City of Davis
23 Russell Blvd.
Davis, CA 95616

Subject: Open Space Element EIR

Dear Mr. Allayaud:

As owners of approximately 900 acres in Solano County, south of Davis and adjacent to I-80, we have followed with interest the proposed new Open Space Element. Several components are shown on our property, including portions of the Davis Greenbelt, Connector Greenway and Nature Reserve along Putah Creek. Since these components will, if implemented, have significant impacts on our property, we ask that the Final EIR address the following issues:

HR-1

1. Compatibility with Agricultural Operations, including aerial spraying, and
2. Trespassing onto agricultural lands and at farmhouse and maintenance sites.

We do not believe it is appropriate to defer the detailed discussion of these impacts until subsequent environmental assessment as stated under Mitigation Measure 1 on page 45. Without knowing whether these incompatibilities can be partially mitigated, the City should not proceed with adoption of the Open Space Element. We say "partially," since the EIR already acknowledges that impacts between existing agricultural land uses and components of the Element will occur that cannot be fully mitigated.

HR-2

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Adoption of the Element and designation of these components on land use maps is an important step with serious long term impacts on our property, and we view adoption of the plan without complete environmental assessment inappropriate. Surely, such important "details" would not be deferred if the proponent were a developer and not the City of Davis.

*

*

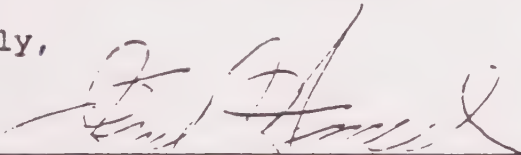
*

We would like to offer an additional comment, in a more general sense, as residents and property owners in the Davis area. With passage of Propositions 108, 111 and 116, there is potential that the Davis area could successfully compete for a commuter rail (Bay Area to Sacramento) station and/or light rail (from Sacramento) station. Designating large amounts of acreage as permanent open space along the I-80 rail corridor will not enhance the area's competitive stance for attracting a rail transportation station. Since all such stations are premised on relatively dense urbanization in proximity (within 1/2 mile) to the stations, the City should carefully consider the relationship of rail transport and the Open Space Element before the Element is adopted.

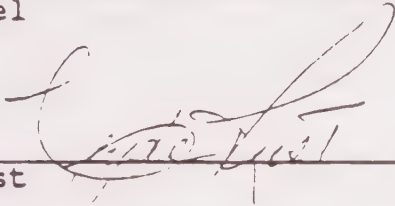
HR-3

Thank you for your consideration of these issues.

Sincerely,



John Hamel



Clyde Rust



Mary Rust

cc: Christina Savage

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CITY OF DAVIS
BUILDING INSPECTION

CHARLES LILLARD
P.O. BOX 4400
DAVIS, CALIFORNIA 95617

June 11, 1990

Bill Allayud
Community Development Department
23 Russell Boulevard
Davis, CA 95616

Dear Bill;

As a part owner of APN 42-120-10 I have reviewed the Open Space Element and EIR and attempted to determine its effect on both my parcel, in particular, and the North Central area in general. While I support the concept of significant park/open space areas it is difficult to evaluate this proposal. It lacks both clarity of definition and specificity.

The location of the greenbelt/buffer is unclear. The northern edge of the Greenbelt/ag buffer in the area east of Pole Line road is shown in the General Plan to be South of the southern boundary of the old City dump. The Open Space Element (OSE) appears to show the greenbelt extending further to the North. The difference to us is significant. Under the General Plan the greenbelt/buffer in this area would all be on property currently proposed to be annexed to the City of Davis. A green belt/buffer totally within the City could reduce the effect on our property. Under the OSE the greenbelt/buffer appears to extend on to our property, which is in the County, and thus would have significant impact on our agricultural practises.

CL-1

The lack of fiscal analysis also makes it extremely difficult to analyse the effect in this area. If the buffer is totally on property to be annexed to the City, then I presume the acquisition and maintenance of the buffer/greenbelt will be through land dedication and maintenance districts in the new development. The proposal will then require a minimum of public funds.

CL-2

If, however, the proposal in this area will utilize public funds and be on land within the County then it should be more closely related to and maximize the use of existing topographical features in the County and County or Public lands. Specifically, in the North Central area a greenbelt location connecting and improving the park on the old City dump, with the wildlife area at the new County land fill and incorporating the Willow Slough by pass should be explored. Such a proposal would produce the greatest amount of park

CL-3

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CITY OF DAVIS
BUILDING INSPECTION

area for the least expenditure, while incorporating existing topographical features, waterways, environmentally sensitive areas and providing for the future incorporation of a connection to Willow Slough. Such a proposal might also coordinate with the revisions to the drainage in this area being considered by Yolo Flood.

Additionally it is unclear in the OSE the relationship of proposed annexations and development of property surrounding Davis. Specifically, the EIR does not evaluate the Wildhorse Golf Course in relation to the greenbelt/buffer nor address to what extent the greenbelt/buffer is within the City or is provided by the Wildhorse Golf Course project. It appears from the maps, although it can not be determined, that, at least in the North Central Area, the vast majority of the property to be annexed to the City will be developed as urban land use and the burden of the greenbelt/buffer will fall on the adjacent county agricultural property. The EIR should allow me to ascertain the relationship between the greenbelt/buffer and current and future annexations/developments.

CL-4

The EIR is also incomplete in that there is not sufficient information to allow me to determine what the effect will be on the agricultural operations on our property. There are general references to spraying but the width of the buffer/greenbelt and the type of land uses proposed adjacent to our property will also effect our wells and drainage, as well as the type of crops permitted. We have several different types of soil on our property and various drainage patterns. The point is, greenbelt/buffer land uses that may be mitigable in one area of our property may be quite harmful in another. I can not find any discussion of the relation of the buffer to soil type or irrigation practises in the EIR. Nor is the project defined clearly enough to allow me to determine what the impact could be, much less to propose any solutions.

CL-5

The EIR's four paragraph discussion of the North Central area (page 40) raises two questions:

- 1) On what basis is the determination made that "the approximate amount of prime agricultural land converted to the Davis Greenbelt uses will be 11 acres." At 100' in width this will accommodate a greenbelt only .89 of a mile in length. While it is difficult to determine from the information given this does not appear to be a sufficient length.
- 2) The proposed Open Space Element map (exhibit 3) shows a connector green way running approximately 45 degrees to Pole Line road. Neither the North Central statistics nor those for the North East show this

CL-6

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CITY OF OAKS
PLANNING DEPARTMENT

connector in the acreage calculations. Where is the loss of this acreage considered?

The review of this document has been a vary frustrating experience. The concerns raised above are only the general questions that I kept returning to again and again during my review. At the conclusion of my review I do not know; how big it is, where is it located, what is happening on the other side, what is happening within it, who is paying for it, or how agricultural practises will be maintained . After many hours I can only conclude that without this basic information the EIR is insufficient.

CL-7

Sincerely,



Charles Lillard

STRENG BROS. HOMES, INC.

DEVELOPERS - INVESTORS

502 MACE BLVD., SUITE 8
DAVIS, CALIFORNIA 95616
754-2829 • 666-0901 • 443-1051

June 11, 1990

Mr Bill Allayaud
City of Davis
23 Russell Blvd
Davis, Ca 95616

Dear Mr Allayaud:

I want to comment on the Proposed Revised Open Space Element Draft EIR.

I believe the cost and financing are so ill defined and that the effect of excess cost are potentially overwhelming to the City and to its Major Facilities Development Fee.

Very truly yours,

Streng Bros. Homes, Inc.

Bill Streng
Bill Streng
by Brenda White *bw*

wb

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PLANNING

West Davis Associates

129 C Street · Davis, CA 95616 · (916) 753-7730

June 11, 1990

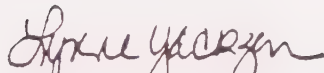
Michael Theile, Planning Division
Planning Department
23 Russell Blvd.
Davis, CA 95616


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CITY OF DAVIS
PLANNING

Dear Mr. Theile,

Please enclose the attached corrections for Table B , page 20 in the Open WDA-1
Space Element of the EIR dated April 26, 1990.

Sincerely,


Lynne Yackzan


Bob Schneider

Corrections for Table B, Page 20

Aspen: 264 Apartments
 66 Affordable Apartments
 300 single family and cluster units
 9 acre school site
 3 acre park site
 4.4 acre greenbelt
 5 acre additional pond
 8.8 acre professional administration
 4 acre pond greenbelt
 110 acre total

June 11, 1990

Mr. Michael Thiele
City of Davis
Community Development Department
23 Russell Blvd.
Davis, CA 95616

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CITY OF DAVIS
PLANNING

Subject: Open Space Element Environmental Impact Report (EIR)

Dear Mr. Thiele,

We have reviewed the Open Space Element EIR. We find the EIR to be inadequate and incomplete. Our major concerns include lack of an adequate analysis and lack of a fiscal analysis. Detailed comments are as follows:

1. Two items should be added to Areas of Controversy:
 - a. Restriction of growth (lack of housing)
 - b. Cost of such a project (page XI)
2. The Fiscal Analysis for the Open Space Element is inadequate.
3. An adequate alternative analysis for the Open Space Element should be completed. The analysis should consider alternative site locations for the specific projects. Also alternative methods of achieving the Open Space elements should be presented. Alternatives such as cluster developments and transfer of development rights (rather than restrictions upon farmland development) should be studied. Other alternatives may allow for the greenway system with new development providing the funding rather than public money as the major source of funding.
4. The cumulative impact analysis is inadequate. An adequate

RY-1

RY-2

RY-3


RY-4

cumulative impact analysis should be completed to the address the impacts from future development on the other side of the proposed greenway. Impacts from viable alternatives such as "satellite cities" should be analyzed.

5. It is stated on Page 11 of Section IV that the fiscal analysis for the revised Open Space element has been prepared under separate cover and will be circulated concurrently with the EIR. This apparently has not been done. Please make this document available and allow for public review prior to adoption of the Final EIR.

RY-5

Very Truly Yours,



Randolph K. Yackzan

June 10, 1990

Steve Greco
602 Lessley Place
Davis, CA 95616

Mr. Bill Allayaud
Community Development Department
City of Davis
23 Russell Blvd.
Davis CA 95616

Dear Mr. Allayaud:

Here are some comments regarding the revised Open Space Element for the City of Davis General Plan and the draft EIR.

Open Space Element

The Open Space Element is a very good policy document which has many excellent concepts. However, the public access portion of the Davis Greenbelt is far too narrow to provide for a quality greenway open space. The current guidelines should be changed from, "100 feet on average" to a minimum of 300 feet with an average of 500 feet. The width should vary from section to section depending on adjacent land uses. The Greenbelt should also include wildlife habitat and the appropriate land use buffers from human use. The current one hundred foot average width is clearly inadequate to accommodate the spectrum of land uses desired for this greenbelt.

SG-

Draft EIR

The draft EIR identifies the loss of potential housing in Yolo County as a significant project-specific impact that cannot be mitigated. I disagree that it cannot be mitigated. Has higher density housing elsewhere (either in the City or unincorporated land) been explored as a mitigation? Furthermore I question the loss of housing as an "environmental impact". Isn't that a "housing impact" that should be mitigated?

SG-2

The draft EIR also identifies the loss of prime agricultural land as a project-specific impact that cannot be mitigated. The Greenbelt (as proposed) will contain and preserve mostly agricultural land. How has this been accounted for? Where is the loss (except within the public access/wildlife areas)?

SG-3

I would appreciate some feedback on some of my concerns.

Sincerely,

Steven E. Greco

DIOCESE OF NORTHERN CALIFORNIA

P.O. BOX 161268 • 1318-27TH STREET • SACRAMENTO, CALIFORNIA 95816

TELEPHONE 916 442-6918

THE RT. REV. JOHN L. THOMPSON, BISHOP

June 8, 1990

Mr. William Allayaud
Principal Planner
City of Davis Planning Department
21 Russell Boulevard
Davis, CA 95616

Dear Mr. Allayaud:

This letter is to notify you that the parcel on Road 104 south of El Macero which is owned by the Protestant Episcopal Church (APN No. 33-110-44 - see attached map) is currently for sale as a single family home site at a listed price of \$300,000.00. This is a use permitted by the County of Yolo, with use permit granted. There are currently two offers on this property pending negotiation at a price of over \$50,000 per acre.

It is our understanding that the City of Davis might subject a 100 foot wide swath of this land to purchase by the City at fair market value for the purpose of a public access corridor. This piece of the property would constitute approximately one-third of the property, as the approximate dimensions of the parcel are about 330 feet wide and 660 feet long. We feel that it would be advisable that this parcel portion not be acquired for the purpose of a public access corridor because of its extremely high cost and value as a potential home site for a single family dwelling. Alternative areas are available at a much more reasonable acquisition cost.

My agents, Louise Jones (447-7878) and Carol Holmes (758-0720) of Lyon and Associates would appreciate the opportunity to talk with you further about this subject.

Very truly yours,

John L. Thompson

Bishop

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CITY OF DAVIS
PLANNING

JLT:jg



DANIEL K. DOWLING

FINANCE & DEVELOPMENT

June 6, 1990

Mr. Bill Allayaud
City of Davis
Community Development Department
23 Russell Boulevard
Davis, CA 95616

Dear Mr. Allayaud:

I have several comments to make concerning my review of the Proposed Revised Open Space Element Draft Environmental Impact Report.

The Swainson hawk nest shown on the Existing Resources of Significance Open Space Element EIR, City of Davis Map, Exhibit 15, indicates a nesting location on the north side of Covell Boulevard between Highway 113 and Road 99, this site has been abandoned. This Map study is over three (3) years old and Mr. Jim Estepe, who tracks these nesting sites, informs me that this is no longer a current nesting site.

DD-

Next, I do not understand how one could possibly evaluate this plan without looking into the cost and financing mechanisms needed to effect its completion. In my opinion they are staggering.

DD-2

Lastly, I do not believe alternate locations have been investigated thoroughly enough, there are other locations which might follow more logical, natural and less costly routes which should be proposed and further evaluated.

DD-3

Sincerely,

Daniel K. Dowling

DKD/ams

open.eir



WELLS FARGO BANK

Private Banking Group
Agricultural Real Estate

P.O. Box 2511
Sacramento, CA 95812
(916) 440-4937
Fax (916) 448-2934

June 5, 1990

Mr. Bill Allayaud
Community Development Department
23 Russell Boulevard
Davis, Ca 95616

RE: Open Space Element
E.I.R. City of Davis
1,852.59 Acres of Trust Property

Dear Mr. Allayaud:

I am writing to you concerning the above referenced E.I.R. I am an agricultural property manager for Wells Fargo Bank's Private Banking Group. I manage three ranches in your planning area, two of which are in the agricultural reserve. The following views are mine, as the property manager of the three trust ranches, and not necessarily those of Wells Fargo Bank.

I feel there are several problems that have not been addressed or have been inadequately addressed in the E.I.R.

1. Two of the trust properties are along Willow Slough. The proposal to place bike paths along the creek and the designation of an Environmentally Sensitive Habitat area will create a severe problem for production agriculture. Both properties obtain irrigation water from Willow Slough. The one property obtains all of its water from the slough. The report does not address what the new land use designations will do to this necessary access. Any loss of this access would severely impact the production of agricultural commodities. The bike path would have the same problems with the pipes and pumps that are required for agricultural use.

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JUN - 6 1990

CITY OF DAVIS
PLANNING

Page 2
June 5, 1990
Mr. Bill Allayaud

2. The added access by the public will also cause severe vandalism and dumping problems. Simple signs, fines, and a few patrols will not mitigate the problem. Vandalism to pumps and equipment is a problem anyway, but when access is enhanced by this plan, it will become severe. We are currently having dumping problems at the end of the Willow Slough bypass and that is not a public access. DB-3
3. The creation of Environmentally Sensitive Areas outside the creeks will remove more good agricultural land than estimated. Although it would only take a small number of acres, all of the roads, storage areas, and other facilities currently on the non-productive areas will have to be moved onto the productive ground. This will eliminate even more acreage from production. DB-4
4. Finally, no real effort was made in the E.I.R. to address the financial impact to the City of Davis. Primarily, the restricted agricultural uses along the creeks will impact both the value of the ranches and their income potential. When an agricultural producer looks at the restrictions to spraying and other cultural practices and the added trespassing and vandalism problems, they will not be willing to pay as much rent. It will also reduce yield thus reducing our beneficiaries income even more. This fact also would reduce the amount that any purchaser would pay should the trust decide to sell the property. I am sure this would be perceived as Down Zoning and require compensation for the loss of value and income. With the amount of property being affected by the Connection Greenway's, Environmentally Sensitive Habitat Areas and Agricultural Reserve Areas, the cost would be significant. DB-5

Should you or anyone involved with this project wish to discuss the above items, please do not hesitate to contact me.

Sincerely,



David J. Brown
Assistant Vice President
Professional Member of the
American Society of Farm Managers
and Rural Appraisers
(916) 440-4936

DJB/ms

HEFNER
STARK &
MAROIS

Law Office

2 Hoffman
2710 Gateway Oaks
Suite 300 South
Sacramento, CA 95833 350
(916) 425-6620
Fax # 925-1127

May 31, 1990

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JUN - 1 1990

CITY OF DAVIS
PLANNING

Mayor and Members of the City Council
City of Davis
23 Russell Boulevard
Davis, CA 95616

Re: Revisions to the Open Space Element of the Davis General Plan

Dear Mayor Corvett and Members of the City Council:

Our firm represents an individual who owns approximately 120 residentially zoned acres located in the southeast portion of the City of Davis. On May 15, Item 5B of the Planning Commission agenda addressed revisions to the Open Space Element of the Davis General Plan. On behalf of our client, we want to express opposition to an open space scheme that designates this residentially zoned property (APN #33-290-46) as land appropriate for greenbelt expansion. In addition, our client is equally opposed to Measure D on the City of Davis June 6 election ballot. Our client has the property under contract and any modification to future permitted land use would adversely affect the value of the pending sale.

On behalf of our client, please add our firm to any notice list for any Planning Commission or City Council meeting that addresses greenbelt issues in the southeast area of Davis. If being noticed and being provided with minutes from these meetings involves a fee, please notify our firm and we will provide payment promptly. Thank you for your consideration.

Very truly yours,

HEFNER, STARK & MAROIS

By

Marshall K. Jaquish

MKJ:sq:davis.cc

cc: Ann Evans
Gerald Adler
Dave Rosenberg
Maynard Skinner
William Carlton
Donald Moore
Larry Garrett
Richard Hoffmann
Donna Lott
Nancy Price
Priscilla Walton
Luke Watkins

Steven E. Hefner
1922-1988

Theodore M. Marois, Jr.
James M. Woodside
Lynn D. Bessie
Kenneth K. Stone
Timothy D. Larson
William M. Goughner
Robert S. W. Lee
Linda A. Marois
Linda M. Marois
Linda S. Lee
Christina L. Swartz
Dennis L. Vighione
Robert P. Bugler
Ronald H. Sargis
Martin B. Steiner
Kevin F. Scheneman
John W. Feist
Jack L. Holland
Joseph F. Huston
James L. Thurston
Steven R. Crooks
Delbert W. Gray
Ralph L. Ferguson
Lisa A. Wilkie Wright
Jeffrey H. Graybill
Howard S. Nevins
Daniel W. Smith
Douglas R. Thorne
Kirk F. Giverson
Michael J. Cook
Edward J. Jaszewski
Judy J. Borchers
Marla J. Winterberger
Marshall K. Jaquish
Julie B. Gustavson
Scott B. Hayward
John M. O'Donnell
Christopher R. Cowie
Beverly M. Jobey
Marina R. Kolokotronis

Of Counsel
Robert N. Stark
Robert W. Bell
Judy Campos McKeehan



Putah Creek Council

P.O. Box 743
Davis • California 95617

Bill Allayaud- Principal Planner
Community Development Department
23 Russell Blvd.
Davis, CA 95616

May 29, 1990

SUBJECT: Draft EIR for City of Davis Open Space Element

Dear Mr. Allayaud,

Putah Creek Council (PCC) is a conservation organization of over 500 members and supporters, including creekside landowners, farmers, scientists, engineers, naturalists, fishermen, and other creek enthusiasts committed to the protection and enhancement of a precious local natural resource. As an organization, we are concerned primarily with the riparian corridor of Putah Creek, its tributaries, and nearby riparian and wetland habitats. We are therefore especially supportive of the Nature Reserve concepts contained in the proposed Open Space Element revisions to the General Plan, and we commend the City Council and planning staff for your tangible commitment to protecting and restoring significant natural areas surrounding the City of Davis.

Several members of PCC have participated in City-sponsored community planning meetings and task forces that contributed to the preparation of the Open Space plan. For the past two years, I have also served as the PCC representative to the City of Davis Proposition 70 Task Force (now the Prop 70 Advisory Committee) charged with implementing the \$2,000,000 fund for acquisition of riparian and wetland habitat in the Davis area. Members of the Prop 70 Task Force who are professional biologists and landscape architects prepared a comprehensive map of all Wetland and Riparian Habitats in the Davis General Plan Study Area (dated February 22, 1989; scale 1"=1,000 feet).

PCC is also a co-founder of and participant in the Yolo Basin Wildlife Area (YBWA) Working Group and helped to draft the Concept Plan for the proposed new state-managed wildlife area.

Comments and criticisms of the Draft EIR by PCC listed below are offered to improve the accuracy of the biological resource inventory and description and to strengthen the effectiveness of the policies and actions recommended in the Final EIR for the protection and enhancement of natural resources in the Davis area.

Specific Comments on Text and Exhibits:

[suggested new text shown in *italics* ; remarks by PCC shown within brackets]

PROJECT DESCRIPTION

Page 11, Table A- PROPOSED OPEN SPACE ELEMENT COMPONENTS: [The statistics in this table are unintentionally misleading but unfortunately may have resulted in errors in the subsequent Impacts Analysis and comparison of various General Plans and policies of several jurisdictions. Specifically, the table significantly overestimates the acreage of 'Nature Reserve/Wildlife Habitat/Wetlands', with a corresponding underestimate of the acreage of 'Agricultural Preserve' under the proposed new Open Space Element.

Although no itemization is provided by the City or the EIR consultants for the figure of 8,691 acres attributed to 'Nature Reserve/Wildlife Habitat/ Wetlands', we assume this amount includes the entire 6,030 acres within Areas A and B of the YBWA Concept Plan. Please note that the Concept Plan states that only a small portion of these two areas are proposed for conversion to permanent and seasonal wetlands, with the balance remaining under current agricultural land use as an Agricultural Preserve. The maximum extent of farmland converted to natural habitats, based on water availability, is estimated to be 20 percent of this area or approximately 1,200 acres, not 6,030 acres.

This confusion has been aggravated by the absence of an actual conceptual design for YBWA, or a table indicating acreage of farmland and habitat for Areas A, B, C, and D. Hopefully, the YBWA Working Group and the Dept. of Fish & Game will provide more detailed conceptual plan alternatives after completion of the technical feasibility study currently underway of water sources, water quality, and economic impacts and benefits related to YBWA as a whole.

A balance of 2,661 acres of 'Nature Reserve/Wildlife Habitat/Wetlands' is left after subtracting the 6,030 acres of Area A & B from the total 8,691 shown in Table A. Is this based on some presumed average width of a Nature Reserve along Willow slough, Dry Slough, Sykes Slough, and the South Fork of Putah Creek, as shown on Exhibit 3? Furthermore, the text states repeatedly (eg. page 42, last sentence) that designated 'Nature Reserves' "...will consist mainly of continued agricultural uses." It therefore seems inappropriate to attribute all or even most of the remaining 2,661 acres to 'Nature Reserve/Wildlife Habitat/Wetlands' when in fact these areas will remain as some sort of Agricultural Preserve or overlap with other dominant new land use designations (eg. Greenbelt, Connector Greenway, Ag Open Space, etc.; see Exhibit 3, page 10 of EIR).

On page 36, in a note in Table E, the text refers to an average width of 200 feet for set-back land protecting Dry Slough and Willow Slough as a Nature Reserve. Based on the map in Exhibit 3, there are approximately 11 miles of proposed protected riparian corridors along Putah Creek, Sykes Slough, Dry Slough, and Willow Slough, not including the already protected portion on the U.C. Davis Putah Creek Reserve. If you multiply 11 miles long times 200 feet wide, the sum equals 266 acres, not 2661 as reflected in Table A. Did somebody misplace a decimal place?

We strongly suggest that Table A, and all subsequent EIR analysis based on the incorrect figures in Table A, be revised to reflect the above observations. The corrected figures should read 1,466 acres of 'Nature Reserve/Wildlife Habitat/Wetlands', 12,273 acres Ag Preserve, and 23,036 acres Ag Open Space, assuming the calculations of acreage for other components are still correct.]

Page 17, Exhibit 4- 'ADJACENT CITIES PLANNING AREAS': [Doesn't the City of West Sacramento show its GP Study Area extending to land west of the Yolo Bypass, within YBWA

SC-1

SC-2

SC-3

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SC-6

Areas A & B, and the City of Davis planning area boundary as well?]

LAND USE

Page 29, Table C- 'CROPS PRODUCED IN 1989 IN AREAS A & B OF THE YOLO BASIN WILDLIFE PLAN': [This table is interesting and useful but a second table should be provided that shows agricultural statistics for the entire General Plan Study Area, not just in areas A & B of the YBWA. Also pertinent to the EIR process is the acreage by crop type of government-subsidized crops or water use (eg. rice production) in the General Plan Study Area, as well.]

SC-7

Page 30, Exhibit 7- 'WILLIAMSON ACT CONTRACT LANDS': [The figure shows Williamson Act land for Yolo County but not for Solano County. Add Solano County areas south of Putah Creek and the North Fork- Putah Creek to complete the entire GP Study Area. Several thousand acres south of Putah Creek are not shown for the Solano County portion of the Davis GP Study Area.]

SC-8

Page 31, Exhibit 8- IMPORTANT FARMLANDS MAP: [This important figure is missing from the Draft EIR. Please send PCC a copy as soon as possible and include Exhibit 8 in the final EIR. This map or an additional map should indicate the extent of Class I and II Agricultural Capability Unit soils in the GP area. This information is easily available from the Yolo County Soil Survey, in particular see the listing following page 102 of the Soil Survey.]

SC-9

Page 32, Table D- 'YOLO COUNTY 1984-1986 LAND USE CONVERSION': [This table is useful in evaluating the conversion of farmland to urban uses in this time period. However, the most substantial rate of conversion may have occurred since 1986. Are these figures available or can they be estimated for the period 1986-1990, at least for the Davis GP Study Area? Also, the second column labeled '1984' should read '1986'.]

SC-10

Page 34, last paragraph; also page 76, Para. 5, under 'East Davis/Mace' and numerous other text locations: [We disagree with the assertion that proposed Nature Reserves may affect nearby crops due to an increase in rodents, or threaten levees due to increased populations of burrowing rodents. No evidence or research citations are offered for this conclusion and we suggest it be removed from the EIR. On the contrary, rodent densities are already very high in crops such as alfalfa and sugar beets. Recent research suggests that existing ground squirrel populations on levees are favored by the absence of dense natural vegetation, a result of standard levee maintenance and inspection policies.

There are certain species of wildlife that can be pests for both agriculture and urban areas. However, most of these pest species (eg. starling, crow, Norway rat, ground squirrel, etc. thrive in the disturbed and food-laden conditions provided by cropland, orchards, and urban refuse. Significant large natural areas such as the riparian forest along Putah Creek provide a much more complex habitat that supports diverse and overwhelmingly unharmed wildlife populations, including predators of wildlife and insect pests.

SC-11

The 19th century notion that native habitats necessarily harbor dens of destructive wildlife pests is unsubstantiated and has contributed to the unwarranted destruction of extensive natural areas near cities and farms. Let's not contribute to such a one-sided view of the universe in an EIR on Open Space in our community, where protection of our remaining natural habitats is a local priority.]

Page 66, paragraph 2, sentence 2: "Exhibit 13 depicts the YBWA Concept Plan *study area boundaries*."

SC-12

same paragraph, sentence 4: "Specifically those participating include,....[list incomplete as shown; add missing sponsors].....*U.S. Fish & Wildlife Service-Joint Ventures, Ducks Unlimited, California Waterfowl Association, University of California-Davis, Putah Creek Council ,....*"

para. 4, last sentence: [add crops beneficial to wildlife] "....include corn, winter wheat, *alfalfa* , *sugar beets* , and *safflower*."

Page 69, Exhibit 13: [delete 'COUNTY' and correct title to read...] STUDY AREA OF PROPOSED YOLO BASIN WILDLIFE AREA

Page 77, under 'Conservation Element', and page 79 under 'County of Yolo- General Plan': [The Land Use Impact analysis states that the creation of the 'Nature Reserve/Wildlife Habitat/Wetlands' areas will result in the loss of prime agricultural land (emphasis added). This theme is repeated throughout the document, but no careful distinction is made between impacts to prime agricultural land versus land of any type that happens to be under agricultural use or zoning. Prime farmland is generally considered land having soil productivity with a soil Capability Unit rating of Class I or Class II in the county Soil Survey. Soil types are typically designated Class III or higher if one or more characteristics of the soil or land limits farm operations or plant growth.

Loss of prime farmland (Class I & II soil) to 'Nature Reserves' is a potential impact, but by no means an unavoidable impact. For example, a portion of the land within Areas A and B of the YBWA is on poor soils (eg. Riz loam having a shallow dense claypan) or is hampered by a persistent shallow water table or flooding that prolongs tillage in the spring. Restored and constructed wetlands can and should be concentrated as much as possible on these non-prime farmland soils. In other cases, a 'Nature Reserve' designation simply means that urban development may be prohibited within some set-back distance from an existing natural area, thereby protecting continued agricultural use rather than impacting prime farmland, as is implied repeatedly in the EIR under the discussion of Land Use.]

BIOLOGICAL RESOURCES

Page 100, para. 1, sentence 5: [add] "...of what is now the Yolo Bypass *and low-lying land west of the Bypass* ."

para. 2, sentence 3: [add] ".....*along the banks of portions of Dry and Willow Sloughs,*" ; [also, change "...Putah Creek overflow channel..." to: "...*South Fork of Putah Creek* ..."]

para. 3, last sentence: [Native grasslands are still present along Putah Creek, primarily a forest understory of blue and creeping wildrye (*Elymus* spp.), with smaller stands of saltgrass, meadow barley, and California brome. Old descriptions of the Davis area recount stories of extensive perennial wildrye meadows shoulder-high to a horse.]

Page 101, Exhibit 15- EXISTING RESOURCES OF SIGNIFICANCE: [This map is incomplete and imprecise. We suggest simply substituting the more comprehensive Map of Wetland and Riparian Habitats in the Davis General Plan Study Area- February 22, 1989, prepared by volunteer professionals for the Proposition 70 Task Force and adopted by the Davis City Council along with their report. The survey map is available in 4 parts, each quadrant reproduced in either 8.5"x11", 11"x17", or 24"x36" (scale: one inch=1,000 feet) formats. These maps were prepared at great length for use in City documents and for planning purposes such as the Open Space Element, using aerial photography confirmed by field surveys in 1989. No need to reinvent the wheel, the work has already been done free-of-charge by local citizens.

For further confirmation of vegetation types and wildlife habitat value ratings within the Davis GP Study Area, refer to the recently completed Yolo County Wetlands and Riparian Woodlands Survey prepared by Jones & Stokes Associates and approved on May 23, 1990 by Yolo County Board of Supervisors. Copies of these maps, overprinted onto U.S.G.S. 1:24,000 scale topographic maps, are available from the Yolo County Community Development Agency in Woodland.]

SC-17

We suggest that the specific locations of Swainson's hawk nests, and any other special status species breeding sites or rare plants, be deleted from Exhibit 15 as a precaution against illegal collecting or depredation. This information is similar in sensitivity to archeological sites and should be treated on a need-to-know basis only. However, please contact Davis Audubon Society or Jim Estep for a more accurate account of the presence of Swainson's hawks in the GP Study Area. You will find that an equal number of nests are concentrated along Putah Creek as well on both the Solano and Yolo County sides.

SC-18

The farmland between Willow Slough and Putah Creek, including the former North Fork of Putah Creek, is significant foraging and nesting habitat for this unique and threatened species of raptor in its most important breeding habitat in the entire state. As a case in point, an estimated 250 Swainson's hawks were observed in fall 1988 catching field mice from a sugar beet field south of Covell Blvd. where the road bends away from Mace Blvd.]

SC-19

Page 104, para. 2, last sentence: [Although only 1 percent of the Davis GP Study Area may be irrigated pasture (unconfirmed) as stated, considerably more than 1 percent of the land area is highly suitable foraging habitat for Swainson's hawk, including several thousand acres of alfalfa that is low-growing, is harvested 6-7 times per year, and supports high prey densities. Also, several thousand more acres of prey base is available as winter wheat is harvested over the spring.]

SC-20

Page 105, section titled 'Habitats and Natural Communities': [In general, the text downplays the importance and quality of existing riparian habitat in the GP Study Area with such phrases as: "...there are some areas that have come to support minor riparian resources."; "...there is not enough space to foster a large enough riparian community to support wildlife species." (in reference to Putah Creek!); or, "While the current expression of riparian communities is relatively minor..."

These descriptions do not accurately coincide with actual conditions along many reaches of Putah Creek and portions of Willow Slough and should be revised to reflect the reality of genuinely significant riparian habitat within the area as we know it. We strongly recommend a field trip to the lower reaches of Putah Creek between the Yolo Bypass and Mace Blvd. bridge, or perhaps a 1-hour fly over in a small plane.

SC-21

We agree with the text in regard to the disturbed nature of all natural areas the Davis area but the same can be said of the entire Central Valley landscape. The lower reaches of Putah Creek support major remnant stands of dense riparian habitat and a diverse array of wildlife species, unlike most of the other degraded creeks and sloughs where most of the forest has been removed completely or confined to a single row of trees.]

Page 106 and 108, 'IMPACTS': [This section considers impacts to biological resources resulting from implementation of the Open Space Element, but not benefits. Implementation of the 'Nature Reserve/Wildlife Habitat/Wetlands' components of the plan will in fact result in a substantial increase of acreage and quality of existing wildlife habitat, particularly wetlands and riparian forest. Furthermore, existing natural areas will receive a measure of long-term protection not presently afforded by the City or County General Plans.

SC-22

At present, the largest wetland habitats in the Davis area are the 20 and 30 acre urban stormwater detention basins (West Pond and Northstar Pond) and the City of Davis' sewage treatment reservoir, all of which attract unique migrating waterfowl and shorebirds not seen anywhere else in the GP Study Area. In contrast, several hundred acres of permanent and seasonal wetlands capable of supporting thousands of waterbirds each year will be created in YBWA Areas A and B alone. In addition, designation of or acquisition of Nature Reserves with set-backs along all our creeks and sloughs will promote the natural recovery of new riparian vegetation within these partially vegetated corridors. These predicted results of the Open Space element should be reflected in the balance sheet of potential impacts and benefits to biological resources.

Finally, we agree that the introduction of human activity into previously unvisited territory can have a potentially harmful effect on sensitive wildlife species, particularly near high quality riparian habitats. We want to underscore the importance of Mitigation Measure #13 on page 109 and urge that alignments and access points for Connector Greenways along Willow Slough and Putah Creek be carefully considered and if necessary rerouted to avoid permanent degradation of habitat quality due to unconfined human intrusion.]

Page 107, Exhibit 16- CONCEPTUAL WILDLIFE ENHANCEMENT MAP: [Although well-intentioned, this map has contributed to the confusion and aggravation of landowners who were previously told by members of the YBWA Working Group that no specific plan for this area has yet been prepared, and that most of the area would remain in current agricultural uses. Although Charles Patterson is listed as the source in small print, the impression is created that this design is part of the official Open Space Element plan or perhaps a previously unreleased plan of the YBWA Working Group, when in fact it is just the casual suggestion of a subconsultant to the consultant that prepared the EIR for the city.

We strongly recommend this figure be removed from the Final EIR, unless the EIR is proposing that this be some sort of mitigation plan for significant impacts to biological resources (of which there are none). No explanation is offered in the text regarding the intent or justification for this site plan as shown. The City of Davis should work with landowners and the YBWA Working Group to prepare a more appropriate and realistic set of conceptual site plan alternatives for Areas A and B that is more compatible with an Agricultural Preserve than the plan shown in Exhibit 16.

Lastly, we suggest that restocking valley oak trees within historic Sykes Slough is more appropriate than creating vernal pools where none previously existed. These are not claypan soils in this area (Sycamore silty loams-drained), nor are sites with deep-rooted towering oaks near major streams likely to support vernal pool formations.]

Page 109, 'MITIGATION MEASURES': [While the mitigation measures for avoiding impacts to biological resources are appropriate, they appear to be confined to land under existing or future City ownership or easement. No proposed mitigation measure or Open Space Element policy provides a compelling reason for private landowners or other agencies to avoid the removal or degradation of riparian or wetland habitat. For example, the City does not have a formal tree ordinance that discourages or prevents the removal of large ancient valley oak trees, except for lines 3.5.F. and 3.5.G. of the East Davis Specific Plan (see Appendix B, page 11). Section 404 of the Clean Water Act prevents the filling of wetlands, but takes no position on the removal of wetland or riparian vegetation.

Putah Creek Council recommends that the City coordinate with Yolo County and specifically with Supervisor Helen Thompson to prepare a county-wide native oak tree protection


ordinance that is applicable to or could be modified for application within the Davis city limits as well as in the unincorporated areas of the GP Study Area. Fines and/or mitigation for native oak tree removal should reflect the true replacement value of trees lost. For example, many recent city and county oak tree ordinances require cash payment or multiple tree replacement based on the diameter of the tree trunk removed, creating an incentive for avoidance of mature specimen tree removal.

A companion ordinance should also be prepared that affords greater oversight and protection of existing riparian vegetation and creek corridors. An ordinance is needed that protects not only the wildlife habitat but also other critical stream functions such as floodwater conveyance and groundwater recharge. We recommend a minimum construction set-back of 100 feet from either top-of-bank or edge of existing riparian forest, whichever is closest. Preferably, a much wider band (eg. 1,000 feet) will be retained as farmland or habitat through land purchases or conservation easements as part of the Nature Reserve, Greenway, or Agricultural Open Space program.]

SC-28

Public education is another effective way to help protect wildlife and unique native flora from unintentional impacts caused by recreational users of natural areas. Landowners and residents can be sensitized to wildlife breeding cycles and critical areas and at the same time contribute to the public's appreciation of the outdoors.

Thank you for the opportunity to comment on the Draft EIR for the Open Space Element of the revised General Plan for the City of Davis. If the City or its consultants have any questions regarding Putah Creek Council's comments and concerns, please contact me at 753-7917 (home) or 329-4840 (office), or contact Robin Kulakow at 758-8882 (home).

Sincerely,

Steve Chainey- Chairman
Putah Creek Council
c/o 2614 Amapola Drive
Davis, CA 95616

copies to:
Jaime Maldonado- STA Planning, Inc.
Pat MacGregor-Davis Open Space Coordinator
Jim Messersmith- California Dept. Fish & Game

attached:
4 pages- Map of Wetland and Riparian Habitats in Davis GP Study Area



Davis Audubon Society

Post Office Box 886 • Davis California 95616

May 24, 1990

RECEIVED

MAY 29 1990

CITY OF DAVIS
PLANNING

Mr. Bill Allayoud
Community Development Department
23 Russell Boulevard
Davis, CA 95616

RE: Proposed Revised Open Space Element Draft Environmental Impact Report

Dear Mr. Allayoud:

The Davis Audubon Society appreciates the opportunity to comment on the Proposed Revised Open Space Element Draft Environmental Impact Report (DEIR). We strongly support the Open Space Element, but have a few comments regarding the DEIR as presented.

General Comments

In preparing the DEIR, the following documents should have been reviewed in addition to those cited as references on pages 140 and 141:

- o City of Davis Proposition 70 Land Acquisition Task Force Final Report, Revised October 1989: Appendix B of this document provides valuable information regarding special status wildlife species and includes a map outlining in detail the existing wildlife habitat within the Davis General Plan area.
- o Yolo County Wetlands and Riparian Areas Inventory
- o Putah Creek Riparian Reserve Management Plan
- o West Pond Management Plan
- o Northstar Development Project Draft Environmental Impact Report

The Davis Audubon Society recommends that the City of Davis develop and implement a conservation plan for the Swainson's Hawk. Proposed future projects within the Davis General Plan area would need to consider cumulative impacts to this state-listed threatened species. A conservation plan would assist the City of Davis in mitigating future impacts to the Swainson's Hawk. Habitat inventory, review of general plan and zoning designations, a process for selecting conservation areas are among the tasks that should be included in such a plan.

Specific Comments

- Page 27 Par 8: The 320-acre Hunt-Wesson disposal site is also managed through a lease agreement with the Davis Audubon Society as a hawk and owl preserve. DAS-
- Page 101 Exhibit 15: The map identifying existing resources of significance has left out several important wildlife habitats, including the Davis Audubon Society & Hunt-Wesson Hawk & Owl Preserve, the City of Davis Sewage Treatment Reservoir and Overland Flow Sewage Treatment Facility, the Core Pond, West Pond (formally Stonegate East Pond), and North Pond. Although the Stonegate West Pond has not been developed as wildlife habitat, the potential exists to enhance its wildlife value. Please refer to the map in Appendix B of the Proposition 70 Final Report. DAS-
- It is unfortunate that Exhibit 15 identifies specific nest locations for Swainson's Hawks. This may increase the nesting hawks' risk of being harassed by humans. Rather than provide the specific location of each nest, the map should identify the density of nest sites within a specified reach of each riparian system. DAS-
- With this in mind, the map should have identified Putah Creek as a significant nesting habitat for Swainson's Hawks.
- Page 104 Par 2: While the DEIR mentions a high concentration of Swainson's Hawk nest sites along both, Willow and Dry Sloughs, it has left out several nesting habitats which are very important to the species. In particular, the entire Putah Creek corridor (north and south forks) should have been identified as a significant nesting habitat for Swainson's Hawks. The Proposition 70 Final Report states that 22 nest sites have been found within this riparian system. The California Natural Diversity Data Base also mentions nest sites along Putah Creek. In addition, Swainson's Hawks are known to nest along the Willow Slough Bypass, the Yolo Bypass sloughs, and in scattered non-riparian areas throughout the General Plan area. DAS-
- Page 105 Par 1: The Giant Garter Snake has also been reported in the Yolo Bypass sloughs. DAS-
- Par 3: The list of other sensitive wildlife species which could be expected within the project location is incomplete. We recommend including the species listed in Appendix II of the Revised Open Space Element, included in Appendix D of the DEIR. Appendix II of the Revised Open Space Element provides detail about sensitive species which should be included in the biological resources section of the DEIR. The following species should be emphasized: DAS-

- o White-faced Ibis: This species is known to forage irregularly within the study area.
- o Northern Harrier: Prime foraging areas include agricultural fields, especially alfalfa. The species typically nests in undisturbed grasslands and wetlands. In May of 1990, five nest sites were identified at the Davis Audubon Society Hawk & Owl Preserve.
- o Cooper's Hawk: The species is suspected of nesting along Willow Slough. They could potentially nest along Putah Creek.
- o Short-eared Owl: This species typically nests in undisturbed grasslands and wetlands. In May of 1990, three nest sites were identified at the Davis Audubon Society Hawk & Owl Preserve.
- o Tricolored Blackbird: Although there have been no recent reports of nesting in Yolo County, the species is an uncommon winter visitor. It could potentially nest in the Yolo Bypass.

Page 106 Par 2: The discussion of habitats and natural communities fails to identify several important habitat resources which currently exist within the project location. Please refer to the comments above regarding Exhibit 15. Although they are predominantly man-made, they provide wildlife habitat of significant value and therefore should be discussed in the DEIR. For more information, please refer to the documents listed above in the general comments of this letter.

Page 107 Exhibit 16: The Conceptual Wildlife Enhancement Map should not have included a conceptual plan for the interior of the proposed Yolo Basin Wildlife Area. The responsibility for the development of this refuge belongs to the Yolo Basin Working Group, composed of a variety of government agencies and private organizations. As yet, no site-specific habitat recommendations have been made by the Yolo Basin Working Group for the proposed wildlife area.

The same map should not have proposed creating vernal pools as Sykes Slough. This area contains a large stand of valley oaks, which typically grow in soils too deep to support vernal pools.

Page 108 Par 3: The impacts from recreational uses within or near sensitive wildlife habitat, both natural and man-made, should be analyzed.

Par 5: The discussion of impacts to wildlife in the biological resources section of the DEIR should include both, the negative and positive impacts on specific sensitive wildlife species. The following species would benefit from the proposed Yolo Basin

Wildlife Area: American White Pelican, White-faced Ibis, Northern Harrier, Sandhill Crane, Long-billed Curlew, Yellow-billed Cuckoo, Short-eared Owl, Tricolored Blackbird, and Giant Garter Snake.

Par 7: Although Putah Creek, Willow Slough, and Dry Slough are remnants of larger riparian systems, they are important wildlife habitats and should not be undervalued. The proposed open space revisions may have little or no adverse impacts to these resources, but not because there is so little sensitive habitat left in the area.

DAS-1

In addition to the remaining sensitive natural habitats, the value of man-made habitats should again be recognized. Please refer to the comments above regarding Exhibit 15 and page 106.

Page 109

Mitigation Measure 9: Due to the partial omission of Swainson's Hawk nest sites from discussion in the DEIR, this mitigation measure emphasizes the northwestern quadrant of the study area. When all the nest sites are considered, it is evident that Swainson's Hawks nest throughout the study area. Therefore, the criteria set forth for mitigation should be emphasized in the entire study area and not just the northwestern quadrant.

DAS-1

Mitigation Measure 13: Those prime (sensitive) habitat locations should be identified. We suggest including the following areas: Putah Creek, Willow Slough, Dry Slough, Sykes Slough, storm water detention basins such as West Pond and North Pond, drainage canals, the Davis Audubon Society & Hunt-Wesson Hawk & Owl Preserve, the City of Davis Sewage Treatment Facilities, and the proposed Yolo Basin Wildlife Area.

Mitigation Measure 15: Because Burrowing Owls nest in abandoned ground squirrel burrows, the City should maintain ground squirrel populations where they would not interfere with the structural integrity of floodway structures.

Page 110

Mitigation Measure 18: This should include the Willow Slough Bypass and the Yolo Basin sloughs.

DAS-1

Mitigation Measure 20: The Valley Elderberry Longhorn Beetle is sensitive to herbicides and pesticides. Therefore, their application should be avoided in the beetle's habitat.

In addition, we would like to comment on Appendix E - Biological Assessment. In this section's own Appendix A (Plant species recommended for

DAS-1

Mr. Bill Allayoud
May 24, 1990
Page 5

open space revegetation and landscaping) the giant reed should be excluded from the list of recommended grasses and herbs. The giant reed is an invasive non-native weed with low wildlife value.

Thank you for considering our comments.

Sincerely,



Ed Whisler
President



Brian Lenz
Conservation Chair

May 23, 1990

RE
H. H. H. H. H.
CITY OF DAVIS
PLANNING

Bill Allayaud
Community Development
Department
23 Russell Boulevard
Davis, CA 95616

Dear Mr. Allayaud:

I am writing to comment on several significant deficiencies evident in the Draft Environmental Impact Report for the City of Davis revised open space element. (State Clearing House #90030133) My comments relate primarily to the "Davis Greenbelt" element of the EIR and open space plan.

The EIR implies that funding for this perimeter greenbelt is included in the General Plan facilities fee. My understanding is that the fee portion allocated to the greenway, as currently constituted, will raise approximately \$15,000,000. Based on extensive experience in purchasing property in and about Davis, including recent discussions with realtors and with landowners whose properties are earmarked for this greenbelt, the fair market value of the land in question is at least \$65,000,000. This is \$50,000,000 more than is being collected with the General Plan facilities fee.

JW-1

The EIR should address this short fall and the impact's full funding of this greenbelt will have on other city programs including open space, affordable housing, capital improvements, and the sociological and economic impacts upon those who are taxed for these funds.

Full funding of this concept will have a dramatic impact on the source, use, and allocation of limited funds within the City for decades.

Secondly, the EIR does not adequately define future land use for this area. There are general references to organic farms (with no evidence of any demand by small parcel organic farmers), wildlife habitat areas, etc. Until these uses are better defined no budget for land improvement or maintenance can be established. As one who has been developing habitat areas upon my farm and in the North Star subdivision I can testify it is expensive to plant and bring to maturity. As a small organic farmer I can testify that such operations are at best, economically marginal. It is

JW-2

May 23, 1990

unlikely any long term, stable, tenant farmers will respond. My understanding is that city greenbelts cost at least \$.10 per square foot per year to maintain. Even if this greenbelt costs \$.01 per square foot it would be in excess of \$1,000,000 per year for maintenance. The EIR does not address these maintenance and use issues adequately.

The EIR does not address police and fire problems. I know from experience that areas of natural landscape will attract transients, vagabonds, fugitives, and teenage runaways with attendant problems of drugs, physical violence, and sanitation. Denying public access only provides more privacy for illicit activities. How would the police department manage and control almost four square miles of this overgrown landscape? How much will it cost? What other police functions will suffer?

This greenbelt, a great deal of which apparently will be left to grow wild, will dry up in the summer providing fuel for raging brush fires. We are all familiar with the potential for fifty and sixty mile an hour dry north winds. This greenbelt is adjacent to development. How will the fire department guard against a potential conflagration?

We have here a city planning to purchase the rights or title to four square miles of land with only the vaguest notion of what it is for, what it will cost, how it will be improved and how it will be maintained. If a developer were to come in with such a notion wanting to proceed with an EIR he/she would be met with incredulous stares. Until there is a definitive land use plan there can be no appropriate study of impact. The draft EIR does not address these impacts because it cannot.

Sincerely,



John Whitcombe

JW/mp

May 24, 1990

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MAY 29 1990

CITY OF DAVIS
PLANNING

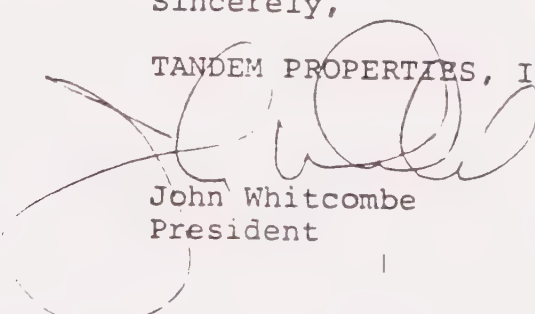
Bill Allayaud
Community Development
Department
23 Russell Boulevard
Davis, CA 95616

Dear Mr. Allayaud:

Shortly after I mailed my letter of May 23, 1990, regarding the draft environmental impact report for the open space element, I came across this article in the "Davis Enterprise". The incident at the Moore Wildlife Sanctuary is timely evidence backing up my sincere concern about uncontrollable wild fires in the Davis Greenbelt area.

Sincerely,

TANDEM PROPERTIES, INC.



John Whitcombe
President

JW/mp

Wildlife preserve has to start over

By JULIE CAMPBELL
Enterprise staff writer

Visions of Smokey the Bear, the fire scene in Disney's "Bambi" and the ravaging Yellowstone Park fires became too real for comfort on April 30 when a wildfire devastated the Moore Wildlife Sanctuary west of Woodland.

Apparently started by a downed electricity line on the north edge of the sanctuary, the fire, fanned by 40 to 50 mph winds, completely engulfed the 15-acre parcel.

"The winds blew the fire from one side of the sanctuary to the boundary on the other side, almost like it was planned," said Jim Eagan, general manager of the Yolo County Flood Control and Water Conservation District, which owns the sanctuary. It is located about two miles northwest of the Fliers Club west of Woodland.

Fire engines and personnel from the Madison and Willow Oaks Fire Departments responded. Teichert Aggregates and Solano Concrete helped fight the fire with both equipment and manpower.

The Moore Wildlife Sanctuary was dedicated 11 years ago almost to the date of the fire at the historic Moore Dam site on Cache Creek.

According to Joe Farnham, naturalist/historian and volunteer caretaker of the refuge, Jim Moore, the sanctuary's namesake and Yolo County's first millionaire, was the first person in Yolo County to start an irrigation project. Moore purchased the acreage from William Gordon in approximately 1850. Gordon had acquired the land in a grant from the Mexican government.

The land has never been farmed or mined and has supported and nurtured an abundance of native

grasses, plants, trees and a wide variety of birds and wildlife.

Few people in the area even knew about the Moore Wildlife Sanctuary. "That's what 'sanctuary' means," said Farnham. "Undisturbed."

However, a few grade school science classes such as Holiday Matchett's class from Dingle School in Woodland have made the trek to the area in the last few years. Children viewed the hawk and bat houses perched on tall poles, the barn owl boxes in the valley oaks and the quail gussler, a protected drinking fountain for quail and rabbits.

Raccoons, beavers, red foxes, skunks, pheasants, deer, snakes and even osprey are just a few of the types of wildlife that either lived at the sanctuary or occasionally visited. The students discussed how water flows and learned how to track.

"The children left with a better knowledge of how everything in nature needs to work together," said Eagan. "They learned respect for the total environment," added Matchett.

Now the trees are all gone, the ground is scorched. The quail gussler ends to be repaired, but a few of the hawk and bat houses have miraculously survived. Until the grasses and foliage begin growing again, much of the wildlife will stay away.

"The dollar amount of the damage is really hard to determine," said Eagan. "How do you put a value on a 200-year-old oak?"

The district plans to replant in the fall. "Because of the water shortage, we can't plant anything until the winter rains begin," said Eagan.

HEIDRICK FARMS, INC.

ROUTE 4, BOX 121B D-5
PHONE (916) 662-8647
WOODLAND, CALIFORNIA
95695

May 18, 1990

Mr. Bill Allayaud
Community Development Department
23 Russell Blvd.
Davis Ca 95616

Dear Mr. Allayaud,

I have reviewed the Draft Environmental Impact Report (DEIR) on the City of Davis Open Space Element and provide the following comments:

As a landowner and farmer that farms over 3700 acres within the boundaries of the project, Heidrick Farms, Inc. strongly opposes the Open Space Element (OSE).

The DEIR did not address the issue of property rights. There was no identification of which land would be purchased in fee, where and what type of easements would be obtained, what would be paid for or how much would be paid. Without such information, it is impossible for a landowner to adequately comment on the project.

HF-1

As the DEIR indicates, the project will significantly impair agricultural productivity and cause land-use incompatibilities. In most cases, impacts on the farmer cannot be adequately mitigated and will result in operational and economic hardships.

HF-2

Some, but not all, of the impacts to the farmer are as follows:

1. Pesticide Application: When applying certain pesticides by air, the County requires a 500 foot buffer from such areas as playgrounds, parks, wildlife areas and critical habitat areas. Within the OSE, the land-use classifications of Environmentally Sensitive Habitat Areas, Davis Greenbelt and Connector Greenway will include such uses as bikeway, recreation, native study areas, community gardens, athletic fields, rest stops, trails and more. With such human activity adjacent to agriculture, the farmer will not only lose the land taken for the various land-uses, but productivity within 500 feet of each side will be effected, if not eliminated.

HF-3

HEIDRICK FARMS, INC.

ROUTE 4, BOX 1218 D-5

PHONE (916) 662-8647

WOODLAND, CALIFORNIA

95698

Mr. Bill Allayaud, Con't. Page 2

2. Trespassing/Vandalism/Liability: The increased human activity will greatly increase the incidence of trespassing, vandalism and theft. Unattended equipment such as irrigation pumps, syphons, sprinklers and tractors make attractive targets for vandals and thieves. The farmer's liability will also increase. Should a trespasser hurt himself on a piece of equipment, the farmer is subject to lawsuits. The City says it will make an effort to minimize the trespassing. But the fact is, with limited resources for everything, including law enforcement, trespassing has and will continue to be of low priority to enforcement agencies.

3. Rodent, Insect and Disease Control: The habitat, greenway and greenbelt areas will provide a haven for rodents, insects and diseases that will significantly reduce the productivity of adjoining ag land.

Increased rodent populations is a major impact which cannot be mitigated by an increase in predators. A large tomato processor which we supply demands that we keep the border areas of our fields clean in order to eliminate any potential rodent problems at harvest. Many times it is necessary to bait levees and other areas for squirrels. Will we be able to bait inside a greenway?

It is standard practice to destroy weeds and other volunteer plants from around our fields to eliminate them as hosts for harmful insects. The establishment of the various land-uses will provide habitat for these insect resulting in a costly impact for the farmer of adjacent fields.

4. Irrigation: Both Willow and Dry Sloughs are a source of irrigation water. Farmers transport water purchased from the Yolo County Flood Control and Water Conservation District through these sloughs. They also use them to transport well water from one field to another.

For those stretches of the sloughs that lie within the habitat areas of the OSE, will we be able to continue to use the sloughs for water? What about the piping? What if it crosses a bikeway? What about our water wells that lie within the habitat area? What about our State water licenses that allow us to use water from these sloughs?

HEIDRICK FARMS, INC.

ROUTE 4, BOX 121B D-5

PHONE (916) 662-8647

WOODLAND, CALIFORNIA

95698

Mr. Bill Allayaud, Con't. Page 3

Heidrick Farms, Inc. has well over 500 acres of prime ag land that relies entirely or partially on irrigation water from Willow and Dry Sloughs.

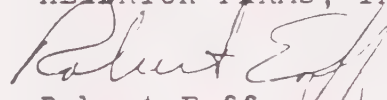
5. Drainage: We farm over 200 acres on the east side of the OSE that is planned for wetlands. Much of this land floods from City drain water during the winter. If it is converted to permanent wetlands, won't the winter drainage problems be moved to other ag land to the west?

HF-7

The impacts of the OSE on agricultural production are extensive. The above is my effort to touch on the major concerns and is not an all-inclusive list.

Sincerely,

HEIDRICK FARMS, INC.



Robert Eoff
Secretary Treasurer

RE/ph

17 May 1990

Mr. Bill Allayaud
Principal Planner
Community Development Department
City of Davis
23 Russell Blvd
Davis, CA 95616

COMMENTS ON OPEN SPACE ELEMENT EIR

I have reviewed the "Open Space Element" EIR prepared for the City of Davis and find it incomplete and possibly flawed. The City's proposal to create a wetland using the effluent from the City's wastewater treatment plant should be rejected and mention made that it will cause considerable adverse impact on waterfowl attracted to that area. These impacts are likely to include waterfowl deaths and birth defects as the City of Davis wastewater contains levels of selenium three to five times the level that the U. S. Fish and Wildlife Service considers safe for use in wetland areas. These high levels were confirmed during a statewide survey of wastewater treatment plants by the Regional Water Quality Control Board and independent testing by the City.

Both the Yolo County Health Department, in a letter to the City dated 20 March 1990 and the Regional Water Quality Control Board in a letter to the City have raised this as a serious concern with the wetlands portion of the project. The EIR response, however, is that this should be considered later. This is a serious enough concern that the EIR should be considered incomplete if it does not note this as a significant environmental impact with no mitigation available. Under such a scenario, it is doubtful that the proposal to create a wetland area outside the Yolo Bypass is even viable.

I don't see how the EIR can recommend a wetland alternative knowing that high selenium water would be used. This would ignore all the mistakes that occurred at Kesterson Reservoir. If the EIR consultants continue with the present EIR, then they should be asked to include that the projected clean-up costs at Kesterson Reservoir are over \$100 million, and they should be asked to describe how the City will bear such costs since their proposed wetlands project is about the same size.

Mention outside the EIR has been made of alternate water sources such as agricultural tailwater and local ground water. We know the groundwater in the area contains selenium; the City has already warned us about our drinking water. Agricultural tailwater is no better; in fact, the entire Willow Slough drainage area has been under study by the Regional Water Quality Control Board for the last two years because of high selenium levels being discharged with the agricultural tailwater.

In summary, because of the very high potential of creating a wetland which is contaminated with selenium, your consultants should indicate that such a project will have significant impacts and recommend that the City drop this idea and seek other alternatives for creating wetlands.

A major alternative may be available by creating a wetland in the Yolo Bypass, which is outside The Davis-Willow Slough selenium problem area and where the City's water could be blended with other supplies in the Bypass to make it safe to use. We should, in the future, encourage our City Council to explore jointly with the County, City of West Sacramento, Department of Fish and Game, U. S. Fish and Wildlife Service and others on creating a major wetland habitat extending the entire length of the Yolo Bypass from the overflow weir presently on the Sacramento River south to Rio Vista.

DW-

Thank you for the opportunity to comment. I will fully support the City in their efforts to encourage the redevelopment of wetlands in Yolo County but must raise a concern about the present proposal where selenium is known to exist.



Dennis W. Westcot
716 Valencia Ave
Davis, CA 95616

cc: STA Planning, Inc.
Jaime C. Maldonado
Senior Project Manager
150 Post Street
Suite 630
San Francisco, CA 94108

Lynnel Pollock
Road 116
Woodland, CA

Bern Kreissman
926 Plum Lane
Davis, CA 95616



COLLEGE OF AGRICULTURAL AND
ENVIRONMENTAL SCIENCES
AGRICULTURAL EXPERIMENT STATION

DEPARTMENT OF ENVIRONMENTAL DESIGN
DESIGN • LANDSCAPE ARCHITECTURE
UNIVERSITY ARBORETUM
CENTER FOR DESIGN RESEARCH
DAVIS, CALIFORNIA 95616

May 15, 1990

Mr. Bill Allayaud
Community Development Department
City of Davis
23 Russell Blvd.
Davis, CA 95616

Dear Mr. Allayaud:

I am writing to offer my comments on the draft EIR for Davis' Revised Open Space Element. As designer (with Kerry Dawson and Stan Jones) of the Davis Greenway Plan, I am pleased to see the concepts and details of the Greenway Plan become integrated in the revised Open Space Element for the Davis General Plan.

The plan and draft EIR are true to the intent of the Greenway concept in creating a publicly accessible and interconnected system of open spaces and natural areas linked by trails, paths and greenstreets. If developed, this plan will serve to integrate people and nature into a system of open spaces which will add to Davis' quality of life as it grows. There are, however, a few conceptual and policy problems I have with the draft Open Space Element and EIR.

1. Width of Greenway/public access portion of Davis Greenbelt. The proposed 100' average width for the public access portion of the Davis Greenbelt is inadequate and would result in a linear and unpleasant recreational experience and unworkable natural system. This is not a design question but a major policy one with implications that should be addressed in the final EIR.

The public access/Greenway portion of the Davis Greenbelt should include a bike/pedestrian trail with opportunities for some loop trails and round trip hikes, diverse vegetation including major groves of trees, drainage channels, open areas for recreational activities such as sports fields, habitat areas and sustainable agriculture. 100' average is clearly inadequate to provide for all these elements.

Existing public access elements of other components of the Davis Greenway are already substantially wider than this. For example, the Covell Greenbelt is a approximately a minimum of 100' wide with an average of approximately 300'. The University Arboretum has a 200' minimum width with a 400' average. The Putah Creek Parkway is 300' minimum width a 600' average.

MF-1

Based on the functional needs of the public access portion of the Greenbelt and similar open spaces which exist in Davis, I recommend that the City revise the Greenway/public access portion of the Davis Greenbelt to be 250' minimum with an average of 500'. The policy in the open space element should also state that this public access portion would vary in width depending on uses which occur along it. The 250' minimum/500' average would allow for the diverse elements to be adequately provided for, contribute to a unique experience for the hiker, biker or jogger, and create adequate space for providing for both people and wildlife. Since sustainable agriculture compatible with public uses would be included within the zone, loss of prime agricultural land could be potentially less than that identified in the draft EIR.

MF-2

2. Recreational assessment of the Greenway. The recreational benefits assessment in the draft EIR needs to be more fully developed. A major function of the Greenway system is to create an interconnected and integrated system of recreational areas. The proposed Connector Greenway and Davis Greenbelt would create unique recreational opportunities currently not provided for in existing Davis open spaces. For example, on a recent spring Sunday, I did an informal study comparing the differences in use between the existing Covell Greenbelt and the existing Greenway portion/drainage channel along the new Northstar development. Walking from my home in West Davis out through the Covell Greenbelt, I counted 20 people engaged in a total of four activities (walking, biking, jogging, playing ball). Along the Northstar Greenway, during a similar period of time, I observed 46 people doing a total of ten activities (running, biking, walking, bird watching, kids playing, nature study, etc.). I would suggest that the Greenway provides for a greater variety of activities and in some cases more use than more traditional parks and greenbelts which already exist in Davis. Recreational benefits such as these need to be fully addressed in the EIR.

MF-3

3. Greenbelt versus Greenway terminology. Confusion and discrepancy still exists in terminology between the "Greenway" versus "Greenbelt" concept, both in the draft EIR and the Open Space element. I would argue that "Davis Greenbelt" is a misleading term for the peripheral Greenway proposed to surround Davis. As suggested above, the character and use of this area would not be like existing Greenbelts in Davis (no turf grass for example, more informal, less designed and refined spaces). As a minimum, the public access portion of what has been renamed the Davis Greenbelt should be referred to as the Davis Greenway. Similarly the Open Space element map (included in draft EIR after p. 9) should show a public access corridor/trail running through what is now called the Davis Greenbelt and connecting around Davis.

MF-4

4. Alignment of Davis Greenbelt. There is one potential area of environmental impact with the proposed alignment of the Davis Greenway which needs to be addressed in the EIR. The Davis Greenbelt as shown on the map currently follows along Covell Blvd both west of 113 and along the Mace curve in East Davis. Assuming that the public access corridor/trail would be on the inside of the Greenbelt, this would create an unpleasant experience for hikers, joggers and bikers along a busy road. Noise and problems of air and visual quality would be

MF-5

significant impacts given this proposed alignment. To mitigate this impact, the dimension of the Greenbelt needs to be expanded along this edge with the public access portion being a minimum of 500' and located at the northern edge of the Greenbelt away from the busy Covell Blvd.

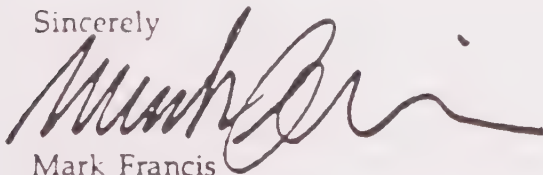
5. Greenway versus "Radial" concept. The major design alternative presented to the Greenway concept is a "Radial Greenbelt" system (p. 123-125). The environmental assessment of this alternative concludes that the impacts of this alternative would be similar. In fact, the "Radial" concept is a very different approach which would not have many of the interconnected and recreational benefits of the Greenway. The Greenway is like a bicycle wheel with spokes of greenstreets and greenbelts going out to the edge of the City and University to connect with an outer rim (trail) which would surround and connect various areas and neighborhoods of the city. A radial concept would not have this benefit and tend to isolate areas of town and create a fragmented open space system. This difference needs to be discussed in the final EIR.
6. Concept credit. Since the open space element is drawn from and largely similar in concept and details of our original "Davis Greenway Plan", credit should be given to it in the Open Space Element and EIR. Currently our original plan is reproduced and included in the EIR (last page of Appendix A) without credit. I would also suggest that reference to our original report be included in the project history (p. 13) and listed in the references (p. 140-141) as follows:

Francis, M., K. Dawson & S. Jones. "The Davis Greenway Plan". Davis: Center for Design Research, UCD. 1987.

For inclusion in the final EIR, I am attaching a better reproduction of the original Greenway Plan plan with proper credits.

I hope these comments are helpful to you in revisions of the draft EIR. It is an excellent document which provides a useful assessment of the potential effects of the proposed Greenway system. I look forward to seeing the final draft EIR and adoption of the revised Open Space element.

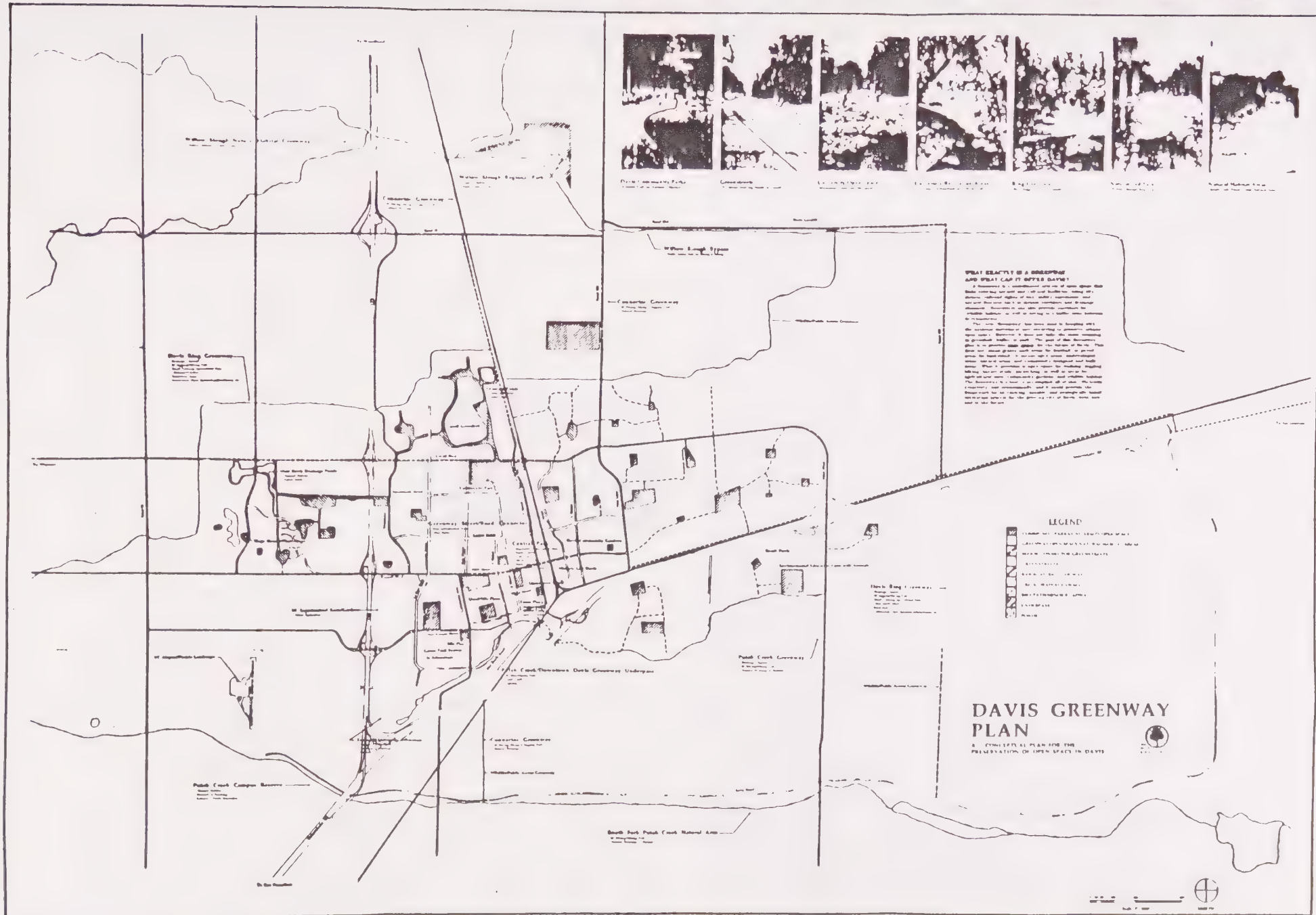
Sincerely

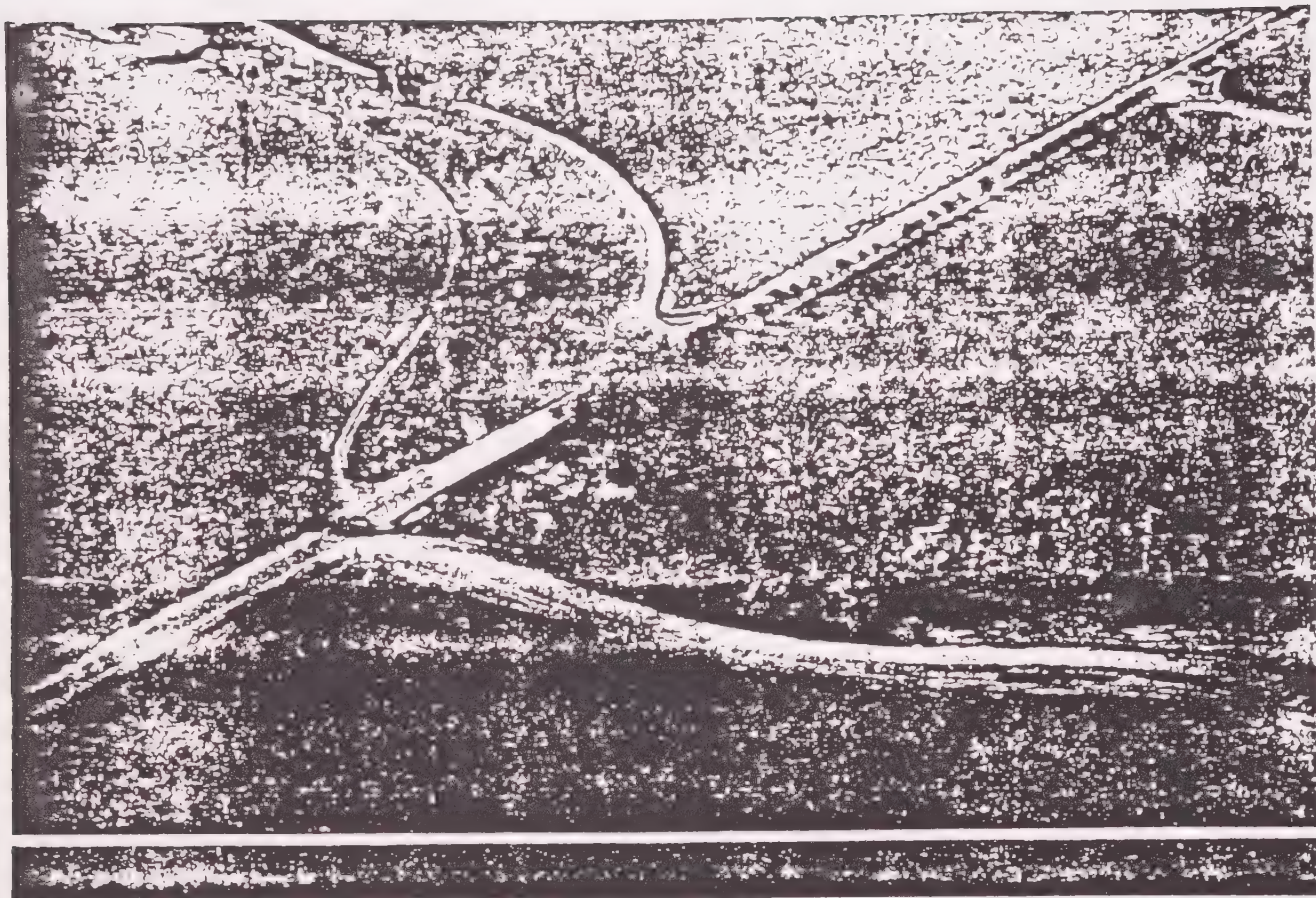


Mark Francis
Professor of Landscape Architecture
Director, Center for Design Research

cc Davis Planning Commission
Davis Natural Resource Commission
Davis Parks & Recreation Commission
Davis City Council

enc

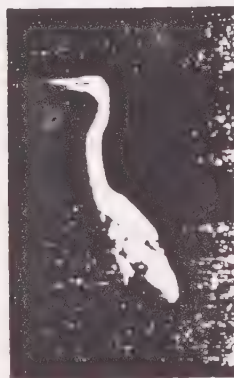




DAVIS GREENWAY

Purpose of the project: Davis, California, is widely recognized as an ecologically responsible community, yet it is rapidly changing from a small, semirural town into a city. The Davis Greenway Plan proposes to maintain Davis's present qualities by developing an integrated open-space system of agricultural lands, recreational areas, natural drainage channels, flood control ponds, wildlife habitats and open-space connectors linking existing and future development. The plan recognizes a need to knit existing open spaces together with future growth areas, and calls for reconnection of the city with its larger regional landscape, including the Sacramento River. The plan creates more than 50 miles of connected trails and public accessways, and creates a cooperative system between humans and wildlife.

Role of the landscape architects: Often landscape architects wait for clients to initiate projects. In this case, the landscape architects saw an opportunity to direct scattered efforts for open-space preservation. Serving to advance public awareness and involvement in developing an integrated open-space plan, the Davis Greenway Plan offered city officials and residents a forum for development of ideas. The



Top: The Greenway would help protect some of the finest riparian habitats remaining in California. Above: The Greenway contains diverse plant and animal populations.

landscape architects developed a conceptual plan for the Greenway with citizen involvement using surveys, interviews, recreation evaluation and cost-benefit analysis. The Greenway proposal creates a framework which will keep landscape architects busy with projects for decades. *Local significance:* The Davis Parks and Recreation Department has hired a coordinator to implement the plan. A "Friends of the Greenway" group has met weekly and conducted informative meetings in public forums. The plan has received the endorsement of the Putah Creek Council, Sierra Club and other local groups.

Special factors: The plan is the first large-scale open-space preservation and development plan in the United States that includes both riparian habitats and agricultural lands ranging in scale from the family farm to corporate agribusiness. The plan offers a fresh approach to open-space planning that links people with natural habitats directly through an integrated system of paths, natural areas and drainage channels. It serves as a model for other communities working to balance development and conservation through open-space conservation.

Location: Davis, California

Landscape architects: Mark Francis, ASLA, Kerry Dawson, ASLA, and Stanton Jones, Center for Design Research, UC Davis

Consultants: Steve Greco and Ann Evans, Friends of the Greenway; Paul Junker, Greenway Coordinator, City of Davis

Client: City of Davis



City of Woodland

COMMUNITY DEVELOPMENT DEPARTMENT

300 FIRST STREET

WOODLAND, CALIFORNIA 95695

(916) 661-5820

May 10, 1990

Bill Allayaud
Principal Planner
Community Development Department
23 Russell Blvd.
Davis, CA 95616

Dear Mr. Allayaud:

The City of Woodland appreciates the opportunity to review the Draft Environmental Impact Report on the Revised Open Space Element of the Davis General Plan. At this point, the City of Woodland does not have any comments on the Environmental Impact Report.

The City Councils of Davis and Woodland are currently negotiating a Memorandum of Understanding for the land between County Road 27 and County Road 29. Our lack of comments on the Environmental Impact Report does not in any way reflect upon the negotiations underway regarding the Memorandum of Understanding.

Thank you again for the opportunity to comment on the Draft Environmental Impact Report.

Sincerely,

Janet M. Ruggiero
Community Development Director

JMR/cm

CW-

RECEIVED
MAY 17 1990



County of Yolo

OFFICE OF THE COUNTY ADMINISTRATOR

225 Court Street, Room 202

Woodland, California 95695

(916) 66-

COUNTY ADMINISTRATOR
DONNA LANDEROS

June 7, 1990

Bill Allayaud, Principal Planner
Community Development Agency
CITY OF DAVIS
23 Russell Boulevard
Davis, CA 95616

Dear Mr. Allayaud:

We have received and reviewed your draft Environmental Impact Report (EIR) for the Revised Open Space Element for the Davis General Plan. This EIR reviews a proposal that is so general that the resulting document has questionable use. None of the major areas of concern are satisfactorily answered by this document. Impacts are listed, but until there are specific projects it is not possible to identify the actual impacts, or mitigation for them.

As specific projects within the Open Space Element are pursued the County will closely review the proposals and impacts on the County and environs. It will be particularly important that the City work with the County on agricultural preserve, drainage and water, population projections, project alternatives, and financial aspects as the major areas in which Yolo County has concerns.

We would like to make some comments to clarify information provided in the draft Open Space Element EIR.

Agricultural Preserve: Currently the County of Yolo has no allowance for wetlands or recreational uses in Williamson Act Contract - Agricultural Preserve areas. The EIR should identify this possible conflict in the land use section.

Drainage and Water: The EIR does not pose any specific methods for providing water to the wetlands. This will be a major question when the specific wetlands EIR is written.

Population Projections: The EIR states that a "worse case" population increase in the Yolo County unincorporated area of the project are could be 758 units and 2,084 people. The text does not explain how this number was derived, other than the County does allow a home on twenty acres. It should be clarified that the County requires a minimum parcel size of twenty acres for a home to be built. If there is a one hundred and sixty acre parcel, it still can only have one home, not eight.

Bill Allayaud

-2-

June 7, 1990

We should also mention that in the discussions of local plans, the EIR does not mention that West Sacramento's General Plan area does, indeed, overlap the City of Davis General Plan area.

DL-6

Project Alternatives: The project alternatives and the analysis for them are unexpectedly brief. We expect that much more in-depth analysis and presentation will be provided for the individual projects EIRs, especially for the wetlands proposal. The County has supported a concept that could be considered an alternative wetlands plan in future EIRs. A description of the initial idea is attached for your information.

DL-7

Fiscal Aspects: We discovered that the fiscal analysis for this proposal had been canceled by the City after placing a telephone call to City staff. This is a very serious concern for us in that it leaves unaddressed our comments concerning impacts on the County General Fund due to the proposed projects. It will be of the utmost importance that these financial impacts are addressed at the time of the specific project EIR's. The City will, of course, also need to identify the funding sources for the right-of-way and land acquisitions, as well as ongoing operations and maintenance that will be necessary for the proposals. We hope to receive a copy of the City staff report in sufficient time to respond on the financial aspect of this project. We have yet to receive staff's analysis of the financial impacts of this project.

DL-8

The EIR points out that it will be crucial that the City work with the adjacent and overlapping governmental agencies to implement the proposals of this new Open Space Element. The City has no direct jurisdiction over any other than what is within their boundaries or purchased by them. It will be the responsibility of the adjoining agencies to actually enforce and implement these proposals, especially since the City proposes no annexation outside its current sphere of influence. This approach will require direct and constant communication between entities to be successful. It will also require that all agencies be equal in determining the final approaches to these proposals as they impact finances, responsibilities, and policy.

DL-9

Sincerely,



Donna Landeros
County Administrative Officer

DL:cn

cc: Bob Traverso, City Manager
Yolo County Board of Supervisors
WETLANDS.EIR



County of Yolo

225 Court Street, Room 204

Woodland, California 95695

(916) 666-8195

BOARD OF SUPERVISORS

First District — Clark H. Cameron
Second District — Helen Thomson
Third District — George P. DeMaio
Fourth District — Betsy A. Marchand
Fifth District — Cowles Mast

MEMORANDUM

TO: Board of Supervisors

FROM: Supervisor Betsy A. Marchand *Betsy A. Marchand*
Supervisor Helen M. Thomson *Helen M. Thomson*

DATE: April 9, 1990

SUBJECT: Yolo Bypass

At the Board's direction we have been extensively involved with federal and state agencies efforts to evaluate, rehabilitate, and upgrade the Sacramento River Flood Control Project (Project). We have established a Yolo County Flood Control Task Force (Task Force) to coordinate our efforts to monitor and understand the numerous investigations underway to restore the integrity of the Project and to increase the overall level of flood protection that it provides. The Task Force includes cities and special districts in Yolo County. Our neighboring county of Solano is participating as well. This participation not only provides for dealing with the Yolo Bypass in its entirety, but continues to foster a relationship which is becoming more and more important as we need to address resource management on a regional basis.

As we become better acquainted with the overall scope and magnitude of the projects being considered, it is becoming abundantly clear that the Yolo Bypass, in various respects, will play a key role in the success of ongoing efforts to achieve increased levels of flood protection for the greater Sacramento Area. For this reason, it is important that we share our understanding with the Board of Supervisors and seek further direction.

First of all, the levees forming the Yolo Bypass are in poor condition - some are obviously worse than others. Although preliminary information has recently been made available, we do not know the full extent of the work required to provide the level of protection that we thought existed. We do know, however, that it will be costly to stabilize and rebuild the levees. Furthermore, it has been made clear to us that cost-sharing at the local level will be required for any work whether it consists of rehabilitating or upgrading. To the extent that



County of Yolo

225 Court Street, Room 204

Woodland, California 95695

(916) 666-8195

BOARD OF SUPERVISORS

May 10, 1990

Director John Turner
Fish and Wildlife Service
Washington, DC 20240

SUBJECT: Yolo Bypass -- Prospects for Environmental Mitigation

Dear Mr. Turner:

As the environmental documentation for both the American River Watershed and Sacramento Metropolitan investigation progress, it appears that environmental mitigation for growth and development related impacts may be substantial. This is particularly true for the North Natomas area in Sacramento.

Also, the public is becoming more aware and recognizes the value in restoring habitat throughout the Central Valley for migratory waterfowl and other wildlife.

As we observe the myriad of activities that are taking place, we believe there would be a great deal of merit if all these forces could come to bear on a common goal. To this end, Yolo County would like to offer for consideration by the U. S. Fish and Wildlife and any other federal and state resource agencies, the concept of utilizing the Yolo Bypass as a federal/state managed waterfowl refuge.

The Yolo Bypass is a valuable resource for Yolo County in terms of agricultural production, its associated economics, and the tax base it provides. These factors are by no means minor, and in offering the concept of a waterfowl refuge, any adverse economic impacts on Yolo County must be offset.

Yolo County is interested in working with you and other federal and state resource agencies and organizations to advance the concept of a Yolo Bypass National Waterfowl Refuge. We will be interested in your reaction to this proposal.

Sincerely,

Helen M. Thomson

Helen M. Thomson, Chair
Yolo County Board of Supervisors

HT:cn

cc: Congressman Vic Fazio

BOARD OF SUPERVISORS
Yolo County, California

Meeting Date: April 17, 1990

To: CAO ✓
Co. Counsel
Auditor
Public Works
Cmty. Devel.
Cmty. Part.
Health Services
Personnel
Social Services
BORCALLI

Entry No. 4

Minute Order No. 90-121: Supported the concept of a managed wildlife refuge/wetlands area inside the Yolo Bypass as put forth in Supervisors Marchand and Thomson's memo "Yolo Bypass" dated April 9, 1990. Authorized Fran Borcalli, Water Consultant to pursue this matter with state and federal authorities. Directed staff to schedule this matter for discussion at the next meeting of the Yolo Levee Task Force.

MOTION: Marchand. SECOND: DeMars. AYES: DeMars, Marchand, Mast, Thomson.
ABSENT: Cameron.

Entry No. 5

Fran Borcalli, Water Consultant, presented a report on Putah Creek Management.

Entry No. 6

Minute Order No. 90-122: The Chair invited sealed bids on the sale of Yolo Town Hall. No sealed bids were received. The Chair invited oral bids; none were received. Referred this issue to the General Services Agency for recommendations on disposition of the property.

MOTION: Marchand. SECOND: Mast. AYES: DeMars, Marchand, Mast, Thomson.
ABSENT: Cameron.

OFFICE OF PLANNING AND RESEARCH

1 TENTH STREET
SACRAMENTO, CA 95814

June 11, 1990

Bill Allayaud
City of Davis
23 Russell Boulevard
Davis, CA 95616

RECEIVED

JUN 12 1990

CITY OF DAVIS
PLANNINGSubject: Revised Open Space Element
SCH# 90030133

Dear Mr. Allayaud:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

OPR-1

Commenting agencies are also required by this section to support their comments with specific documentation. These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Nancy Mitchell at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

David C. Nunenkamp
Deputy Director, Permit Assistance

Enclosures

cc: Resources Agency

Memorandum

To : 1. Projects Coordinator
Resources Agency

2. Mr. Bill Allayaud
City of Davis
23 Russell Boulevard
Davis, CA 95616

Date June 7, 1990

From : Department of Fish and Game

Subject: Proposed Revised Open Space Element Draft Environmental Impact Report (EIR) for the City of Davis, Yolo County (SCH 90030133)

The Department of Fish and Game (DFG) has reviewed the Draft EIR of the Revised Open Space Element for the City of Davis. The primary goal of the Revised Open Space Element is to provide the City with a continuous greenway system. The greenway concept consists of several components linking existing and future recreational and open space areas both within and outside of the City limits. This proposed planning area covers approximately 84 square miles, 7 of which are located within the City of Davis.

The project components including Agricultural Nature Preserves, Wildlife Habitat, and Wetlands are the most significant components of this plan in relation to preserving and enhancing fish and wildlife habitat in the project area. The Nature Preserves component includes 6,000 acres along the east side of the planning area and a linear right of way along Putah Creek, Willow Slough, and Dry Slough. Development of wetlands and upland wildlife habitat on the 6,000 acres will benefit both resident and migratory wildlife.

The Agricultural Preserve component is shown on page 10, Exhibit 3, as most of the area between County roads 27 and 29. This area, like the Putah Creek corridor, is important as a Swainson's hawk (Buteo swainsoni) nesting area. Also, as all urban areas in the County expand, this area will become increasingly more important as a foraging area for these birds and other raptors such as northern harriers and red-tailed hawks. The City identifies this Agricultural Preserve Component as permanent agriculture and the County General Plan identifies it as agricultural preserve. These designations will keep the area in agriculture but will not necessarily provide the permanent status that is needed to protect Swainson's hawk populations into the future. We recommend consultation with DFG on enhancing and preserving these agriculture areas to benefit wildlife while maintaining agriculture. The DFG is preparing mitigation guidelines for the Swainson's hawk which will be sent to the City when completed.

This greenbelt has the potential to provide habitat for many listed and sensitive species by retaining functioning riparian

1. Projects Coordinator
2. Mr. Bill Allayaud

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June 7, 1990

corridors and adequate adjacent forage habitat. Some of these species are listed on pages 103-105 of the Draft EIR. Burrowing owls are easily managed for on adjacent pastures or agricultural areas. Simple and inexpensive management techniques such as creating berms and artificial burrows may help to increase local populations by enhancing nesting habitat. The use of rodenticides and other pesticides needs to be thoroughly researched and controlled prior to application near sensitive species. The DFG would welcome the opportunity to work with the City of Davis in developing management strategies for sensitive species in or near the proposed greenbelt.

In order to comply with Public Resources Code Section 21081.6, a detailed monitoring program must be developed for all required mitigation conditions. The monitoring program should include the following:

- a. Specific criteria to measure effectiveness of mitigation.
- b. Annual monitoring for a minimum of five years. Annual written reports submitted to the lead agency and the DFG.
- c. Annual monitoring reports, each of which include corrective recommendations that shall be implemented in order to ensure that mitigation efforts are successful.

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

The applicant should be advised that work consisting of but not limited to diversion or obstruction of the natural flow or changes in the channel, bed, or bank of any river, stream, or lake, will require notification to the DFG as required by Fish and Game Code Section 1600, et seq. The notification (with fee) and subsequent agreement must be completed prior to initiating any such work. Notification to the DFG should be made after the project is approved by the lead agency. The agreement process should not be used in lieu of specific mitigation measures to be included as conditions of project approval by the lead agency.

In conclusion, the DFG believes that this project has the potential to preserve and enhance wildlife and endangered species habitats within the City of Davis and adjacent portions of Yolo County. We plan to work with the City toward these goals.

CDFG-

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CDFG-

1. Projects Coordinator
2. Mr. Bill Allayaud

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June 7, 1990

If the DFG can be of further assistance, please contact Mr. Dan Smith, Associate Wildlife Biologist, or Ms. Patricia Perkins, Wildlife Management Supervisor, Region 2, Department of Fish and Game, 1701 Nimbus Road, Suite A, Rancho Cordova, CA 95670, telephone (916) 355-7010.



Pete Bontadelli
Director

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
CENTRAL VALLEY REGION1443 ROUTIER ROAD
SACRAMENTO, CA 95827-3098

18 May 1990

Mr. Bill Allayaud
Community Development Department
City of Davis
23 Russell Boulevard
Davis, CA 95616

OPEN SPACE ELEMENT DRAFT ENVIRONMENTAL IMPACT REPORT (EIR), CITY OF DAVIS, YOLO COUNTY

I have reviewed the Revised Open Space Element Draft Environmental Impact Report (SCH No. 90030133) dated 26 April 1990. My comments are as follows:

1. The use of waters with moderately low concentrations of selenium for wetland and marsh systems has often caused selenium accumulation in plant and animal life at toxic levels. Treatment plant effluent, agricultural drainage and ground water from Davis contain significant levels of selenium. The proposal to use these waters for wetlands development could have significant adverse environmental impacts which need to be addressed in the EIR. RM
2. Development of the wetlands using treatment plant effluent would require issuance of waste discharge requirements by the Regional Board. It is unlikely that the Board would allow the use of this water in a wetland. RM
3. Meeting California Code of Regulations Title 22 wastewater reclamation criteria to assure positive health protection may require improvements at the wastewater treatment plant. RM

If I can be of assistance or answer any questions, please call me at (916) 361-5656.

A handwritten signature in dark ink, reading "Richard P. McHenry", is written over the typed name.

RICHARD P. MCHENRY
Area Engineer

RPM/mm

cc: Mr. Thomas To, Yolo County Department of Environmental Resources, Woodland

90030133

13. ~~_____~~

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